#### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	) ) )
Plaintiff,	Civil Action No. 18-cv-5587
v.	) Hon. John Z. Lee
EQUITYBUILD, INC., EQUITYBUILD FINANCE, LLC, JEROME H. COHEN, and SHAUN D. COHEN,	) Magistrate Judge Young B. Kim )
Defendants.	) ) )

### RECEIVER'S FIFTEENTH INTERIM APPLICATION AND MOTION FOR COURT APPROVAL OF PAYMENT OF FEES AND EXPENSES OF RECEIVER AND RECEIVER'S RETAINED PROFESSIONALS

Kevin B. Duff, as the receiver ("Receiver") for the Estate of Defendants EquityBuild, Inc., EquityBuild Finance, LLC, their affiliates, and the affiliate entities of Defendants Jerome Cohen and Shaun Cohen, as defined in the Order Appointing Receiver entered August 17, 2018 (Dkt. No. 16), as supplemented by Order entered March 14, 2019 (Dkt. No. 290) and Order entered February 21, 2020 (Dkt. No. 634) (collectively, the "Receivership Defendants"), and pursuant to the powers vested in him by Order of this Court, respectfully submits this Fifteenth Interim Application ("Application") for the First Quarter 2022, and moves this Court for an order approving payment of the fees and expenses of the Receiver, the Receiver's counsel, Rachlis Duff & Peel, LLC ("RDP"), the Receiver's accountants KMA S.C. f/k/a BrookWeiner, LLC ("KMA") and Miller Kaplan Arase LLP ("Miller Kaplan"), and the Receiver's forensic IT consultant, Prometheum. In support of his Application and Motion, the Receiver states as follows:

#### I. BACKGROUND

On August 15, 2018, the United States Securities and Exchange Commission ("SEC") filed a civil Complaint against Jerome Cohen, Shaun Cohen, EquityBuild Inc., and EquityBuild Finance LLC (collectively the "Defendants") alleging violations of federal securities laws, along with a motion for entry of an asset freeze, permanent injunction, and other ancillary relief. (Dkt. Nos. 1 & 3, respectively)

In their Complaint against the Defendants, the SEC alleged violations of Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78j(b), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5, Section 20(a) of the Exchange Act, 15 U.S.C. §78t(a), Sections 5(a) and 5(c) of the Securities Act of 1933 (the "Securities Act"), 15 U.S.C. §77e(a) and (c), and Section 17(a) of the Securities Act, 15 U.S.C. §877q(a)q. (Dkt. No. 1)

The Complaint further alleged that the Defendants operated a Ponzi-scheme that raised at least \$135 million from more than 900 investors by, among other things, making untrue statements of material fact in connection with the sale of promissory notes allegedly secured by residential real estate primarily located on the south side of Chicago. (*Id.* ¶¶ 1-7, 17, 20-51)

On August 28, 2018, the Court entered a judgment against defendants Jerome Cohen and Shaun Cohen which, among other things, enjoined future violations of federal securities laws. (Dkt. No. 40)

In connection with its civil action, the SEC sought and obtained Court approval for the appointment of a Receiver, and on August 17, 2018, this Court entered an Order Appointing Receiver. (Dkt. No. 16)

Under the Order Appointing Receiver, the Receiver was authorized to engage and employ persons and entities in his discretion to assist him in carrying out the duties and responsibilities set forth in the Order. (*Id.*, Order Appointing Receiver, ¶ 54)

Accordingly, the Receiver retained RDP as special counsel, and, on August 20, 2018, the Court entered an Order approving RDP's rates. (Dkt. No. 19) On August 23, 2018, the Receiver retained BrookWeiner, which recently became KMA, to provide accounting services and to perform tax and related work regarding the assets of the Receivership Defendants, and Miller Kaplan to serve as Tax Administrator of the Settlement Fund. (Dkt. No. 32) On August 28, 2018, the Court entered an Order approving KMA's and Miller Kaplan's rates. (Dkt. Nos. 39 & 45) On August 31, 2018, the Receiver retained Prometheum to access and preserve data within EquityBuild's cloud-based storage systems and provide related IT services, and, on September 6, 2018, the Court entered an order approving Prometheum's rates. (Dkt. No. 56)

Pursuant to the Order Appointing Receiver, the Receiver and his retained personnel are entitled to "reasonable compensation and expense reimbursement" from the Receivership Estate, as described in the "Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission" (the "Billing Instructions") agreed to by the Receiver. (Dkt. No. 16,  $\P$  69)

#### II. FIFTEENTH INTERIM APPLICATION

Pursuant to the Billing Instructions, the Receiver provides the following information regarding this Application:

- a. The Application covers the period from January 1, 2022, through March 31, 2022.
- b. The names or job titles and hourly rates of all professionals for RDP, KMA, and Miller Kaplan, as well as Prometheum's hourly rates, are attached as **Exhibit A**.

c. This is the Receiver's Fifteenth Interim Application. The dates and amounts of the Receiver's prior interim fee applications, the orders and amounts allowed, and the amounts paid and unpaid, are attached hereto as **Exhibit B**.

#### III. CASE STATUS

Pursuant to the Billing Instructions, the Receiver provides the following information regarding the status of the case, and activities performed specifically for the period covered by this Application. *See also* Receiver's Fifteenth Status Report (First Quarter 2022) for additional information. (Dkt. No. 1243)

#### a. Cash on Hand and Funds Received and Disbursed During the Quarter

The Receiver's Standardized Fund Accounting Report ("SFAR") for the First Quarter 2022 is attached as **Exhibit C**. The SFAR sets forth the funds received and disbursed from the Receivership estate during this reporting period. As reported in the SFAR, the amount of cash on hand as of March 31, 2022 was \$1,125,649.01. The information reflected in the SFAR was based on records and information currently available to the Receiver. The Receiver and his advisors are continuing with their evaluation and analysis.

#### b. <u>Receiver's Administration of the Case</u>

Upon his appointment, the Receiver began making efforts to determine the nature, location, and value of all property interests of the Receivership Defendants, including monies, funds, securities, credits, effects, goods, chattels, lands, premises, leases, claims, choses in action, rights and other assets, together with all profits, interest, or other income attributable thereto, which the Receivership Defendants owned, possessed, retained a beneficial interest in, or controlled directly or indirectly, and to preserve and maintain those assets. In furtherance of such, the Receiver took, *inter alia*, the following actions:

#### i. Identification and Preservation of Assets

During the First Quarter 2022, the Receiver attended to the preservation, operation, maintenance, and sale of the last real estate property remaining in the Receivership Estate at the beginning of the quarter.

Additionally, the Receiver, with the assistance of counsel, worked to resolve several notices regarding building code violations involving the properties located at 8209 S Ellis and 4533 S Calumet and a collection notice for an unpaid administrative judgment concerning the property located at 5001 S Drexel. The Receiver disputed the new cases through the City's ownership dispute procedures, and notified collection counsel that the EquityBuild entities had been dismissed from the matter in 2020, prior to the entry of the judgment at issue.

#### ii. <u>Property Sales</u>

During First Quarter 2022, the Receiver and his retained professionals closed the sale of the last remaining property in the estate, 7109-19 S Calumet Avenue. The Receiver filed his Fifteenth Motion to Confirm the sale of 7109-19 S Calumet on December 30, 2021 (Dkt. No. 1110), the Court entered an order approving the sale on January 24, 2022 (Dkt. No. 1138), and the sale closed on February 28, 2022.

#### iii. Financial Reporting and Funds Restoration

During the quarter, the Receiver's counsel has continued working with third parties to obtain the complete information needed to allocate insurance expenses and refunds to properties and provide final accounting reports to the Court and the claimants. Once this process is completed, the Receiver will seek the Court's approval to reimburse the Receiver's Account for any funds that the Receiver expended on the properties.

#### iv. Open Litigation

During the quarter, the Receiver communicated with counsel for plaintiff regarding a stay of the matter captioned *Pennington v. 4533 Calumet, LLC*, Case No. 2021 L 010115, Circuit Court of Cook County, naming EquityBuild affiliate 4533-37 S Calumet, LLC, and property manager WPD Management, LLC. On January 10, 2022 the insurer notified the Receiver of its determination that there is no coverage for the *Pennington* lawsuit under the policies, and on January 27, 2022, a stay order was entered by the trial court.

The Receiver also worked with defense counsel retained by EquityBuild's insurer in the matter captioned *Byrd v. EquityBuild, Inc., et al.*, Case No. 18 L 1993, Circuit Court of Cook County, to prepare for pretrial motions and a trial that was scheduled to begin on March 21, 2022. On March 25, 2022, the case settled before a jury was selected, and the estate is responsible only for the policy's \$10,000 insurance deductible.

#### v. <u>Notice of Appointment of Receiver</u>

During the First Quarter 2022, the Receiver continued his efforts to notify all necessary and relevant individuals and entities of the appointment and to protect and preserve the assets of the Receivership Estate. To that end, as they are identified, the Receiver continues to deliver notices to individuals or entities which have been identified as potentially having possession of the property, business, books, records, or accounts of the Receivership Defendants, or who may have retained, managed, held, insured, or encumbered, or had otherwise been involved with any of the assets of the Receivership Defendants.

#### vi. <u>Control of Receivership Property and Records</u>

During the First Quarter 2022, the Receiver continued efforts to locate and preserve all EquityBuild property and records. The Receiver maintained two platforms of records and data

during the First Quarter 2022, and worked with vendor CloudNine and counsel for the institutional lenders with respect to the disposition and preservation of the documents in the database of EquityBuild internal documents.

#### vii. <u>Factual Investigation</u>

During the First Quarter 2022, the Receiver and his retained professionals continued to review and analyze the following: (i) documents and correspondence sent to or received from the EquityBuild principals, to whose email accounts the Receiver has access; (ii) bank records from EquityBuild and its affiliate entities; (iii) EquityBuild documents stored in the CloudNine database; (iv) available underlying transaction documents received to date from former Chicagobased EquityBuild counsel; and (v) files produced by former EquityBuild counsel, accountants, and employees.

During the First Quarter 2022, the Receiver and his retained counsel devoted efforts to prosecuting claims asserted against former EquityBuild professionals including, *inter alia*: (1) the law firm Rock Fusco & Connelly LLC ("Rock Fusco"), (2) Ioana Salajanu, a lawyer formerly at Rock Fusco, (3) the law firm Bregman, Berbert, Schwartz & Gilday, LLC and (4) lawyer Mark L. Rosenberg. These claims are for professional malpractice and aiding and abetting the Cohen's breaches of their fiduciary duties. During the quarter, the Receiver continued to address written discovery issues and continued its review and analysis of records produced in discovery. In the action against Mark L. Rosenberg, which had been removed to federal court, Rosenberg filed a motion for summary judgment based on the statute of limitations and the Receiver, in turn, filed a motion for sanctions against Rosenberg due to the lack of merit to his motion for summary judgment. In that action, the Receiver also participated in an April 4, 2022 settlement conference with Magistrate Cole and which also included the Bregman, Berbert, Schwartz & Gilday, LLC

firm and their insurers. No settlement was reached but the parties then engaged in a mediation with Hon. Stuart Nudelman (Ret) of ADR Systems on May 4, 2022. No settlement was reached in that mediation and further discovery in the suits is expected.

During the quarter, the Receiver also engaged in related motion practice related to claimant Liberty EBCP, LLC's motion in the SEC action for a determination that this Court's stay of litigation was not applicable to its malpractice action captioned *Liberty EBCP*, *LLC v. Rock Fusco & Connelly, LLC, and Ioana Salajanu*, Case No. 20-L-4725, Circuit Court of Cook County. (Dkt. No. 1119) The Receiver submitted a response (Dkt. No. 1141), and after full briefing, on March 23, 2022, the Court denied Liberty's motion. (Dkt. No. 1222)

#### viii. Tax Issues

KMA f/k/a BrookWeiner was retained to perform accounting, tax, and related work in connection with winding down the business operations of the Receivership Defendants. During the quarter, KMA worked on property statements and property spreadsheets, assisted with cash flow analysis matters, and corresponded with the IRS regarding old partnership income tax returns.

Miller Kaplan was retained to serve as the Tax Administrator to take all necessary steps to enable the Settlement Fund to obtain and maintain the status of a taxable Qualified Settlement Fund ("QSF"), including the filing of all required elections and statements contemplated by those provisions, and to pay taxes in a manner consistent with treatment of the Settlement Fund as a QSF. During calendar year 2021 and the First Quarter 2022, Miller Kaplan prepared and filed the 2020 Qualified Settlement Fund Income Tax Return, paid quarterly estimated taxes for the year 2021, and is working on the 2021 Qualified Settlement Fund Income Tax return.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> The deadline to file the 2021 return was extended to October 18, 2022.

#### ix. Accounts Established by Receiver for the Benefit of the Receivership Estate

The Receiver established custodial accounts at a federally insured financial institution to hold all cash equivalent Receivership property. The interest-bearing checking accounts are used by the Receiver to collect liquid assets of the estate and to pay the portfolio-related and administrative expenses. For each property encumbered by secured debt that has sold, the Receiver also has established a separate interest-bearing account for the purpose of depositing and holding funds until such time as the Court orders otherwise and for ultimate distribution, following a claims process and upon Court approval, to the creditors of the Estate, including the defrauded investors. (Dkt. Nos. 230, 311, 344 & 346)

#### c. Creditors and Claims Against the Receivership Estate

During the First Quarter 2022, the Receiver and his retained professionals continued to improve the accuracy and completeness of the "Master Claims Exhibit," preliminarily identifying on a property-by-property basis for each of the nearly 2400 claims the following: (i) claimant name, (ii) total amount claimed, (iii) claimant category, and (iv) the amount loaned or invested in the particular property (where it could be determined from the face of the claim form). The Receiver has encouraged claimants to review this exhibit and bring any discrepancies to the attention of the Receiver, and the Receiver and his retained professionals have updated the exhibit where appropriate. The most recent version of the Master Claims Exhibit was submitted with the First Quarter 2022 Status Report filed on April 29, 2022. (Dkt. No. 1243 at Ex. 6) This work was reasonable, necessary, and beneficial to the Receivership estate, and has allowed the Receiver's claims vendors (1) to organize, on a property-by-property basis, the claim forms and supporting documentation that claimants have submitted to the Receiver, and (2) to provide each claimant who did not opt out of the Confidentiality Order with digital links for the transfer of the claim

forms and supporting documentation of other claimants asserting claims against the same property or properties in the receivership estate, consistent with Court orders. The Receiver also worked to update and confirm the accuracy of claimants' email, address, and counsel records, both for the preparation of framing reports, and for use in the creation of email distribution lists for claimants to use in discovery and the claims process.

The First Quarter 2022 was devoted primarily to the disputed claims process for the five properties in Group 1 (3074 Cheltenham Place; 7625-33 S East End Avenue; 7635-43 S East End Avenue; 7750-58 S Muskegon Avenue; and 7201 S Constance Avenue), which began on July 6, 2021 (Dkt. Nos. 1004-1006). During the quarter, the Receiver and his counsel and staff: (1) researched and prepared a disclosure regarding the Receiver's avoidance claim against institutional lender BC57, LLC ("BC57"); (2) engaged in additional discovery regarding the Receiver's avoidance claim; (3) reviewed and analyzed the position statements filed by BC57, the SEC, and 51 investor-lender claimants; (4) studied the proofs of claim, discovery materials, and EquityBuild documents and correspondence relating to the Group 1 claims; (5) made recommendations as to the validity and amount of each of the 169 claims submitted with respect to the five Group 1 claims; (7) studied the responsive position statements filed by BC57, the SEC and several of the claimants; (8) prepared and filed a reply memorandum in support of the Receiver's avoidance claim.

The Receiver and his professionals also devoted effort during the quarter to the separate claims process requested by institutional lenders U.S. Bank National Association and Midland Loan Services regarding the resolution of their claims relating to properties in which no other claimants have submitted a claim. The Receiver's counsel completed review of the nearly 10,000

pages constituting these institutional lenders' proofs of claim submissions, and began to review extensive productions served in response to subpoenas to third-party title companies Primary Title Services LLC, OS National LLC, Avenue 365 Title Company, and Chicago Title Insurance Company, and by loan originator CBRE Capital Markets Inc.

Additionally, during the First Quarter 2022, the Receiver and his professionals (1) worked with counsel for claimants to file three joint status reports with the Court relating to the claims process (Dkt. Nos. 1139, 1166, 1229); (2) worked with intervening counsel representing investors in properties that EquityBuild sold before the commencement of the receivership to negotiate a Stipulated Order resolving these investors' motion requesting leave to name EquityBuild in mortgage foreclosure actions relating to four such properties (Dkt. No. 1176); (3) drafted communications to all claimants regarding the EquityBuild documents database and responded to approximately 145 claimant inquiries, in addition to numerous oral and other written communications with claimants and certain claimants' counsel regarding the claims process and the receivership; and (4) engaged in various other activities relating to the claims process as reflected in the submitted invoices.

The Receiver is continuously updating all claimants on the developments in this matter, and responding in a timely manner to the hundreds of emails and voicemails from investors and others, many if not most of which related to the claims submitted against the Estate and the status of the Court's process for resolving those claims and distributing the Estate's assets. To ease the burden and provide basic information, the Receiver established a web page (<a href="http://rdaplaw.net/receivership-for-equitybuild">http://rdaplaw.net/receivership-for-equitybuild</a>) for claimants and other interested parties to obtain information and certain court filings related to the Receivership estate, which remains in

place today and continues to be best and most cost-effective mean of providing information regarding the status of this action.

#### d. <u>Assets in Receivership Estate</u>

All known Receivership Property is identified and described in the Master Asset List attached hereto as **Exhibit D**. The Master Asset List identifies 56 checking accounts in the names of the affiliates and affiliate entities included as Receivership Defendants, reflecting a combined balance in the Receiver's accounts as of March 31, 2022 of \$1,125,649.01. (*See also* Dkt. No. 258 at 21, and Dkt. No. 348 at 23-24, for additional information relating to these funds.) Additionally, 103 separate interest-bearing accounts established by the Receiver to hold the proceeds from sold real estate are identified on **Exhibit E**, which collectively contained \$70,387,156.70 as of March 31, 2022.

The Master Asset List does not include funds received or recovered after March 31, 2022. Nor does it include potentially recoverable assets for which the Receiver is still evaluating the value, potential value, and/or ownership interests. The Receiver is in the process of evaluating certain other types of assets that may be recoverable by the Receivership Estate.

#### IV. BILLING ADDRESSED IN THIS APPLICATION

Pursuant to the Billing Instructions, the Receiver provides the following information regarding current billing:

#### a. <u>Total Compensation and Expenses Requested.</u>

i. In connection with his duties, the Receiver respectfully requests compensation for services rendered, totaling \$45,552.00 for the period of this Application. Copies of the Receiver's invoices for January, February and March, 2022 are attached as **Exhibit F**.

- ii. In connection with the legal services provided to the Receiver by RDP, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$179,294.74 for the period of this Application. Copies of RDP's invoices for January, February and March, 2022 are attached as **Exhibit G**. The Receiver's counsel Andrew Porter received \$2,970.40 as agency fees for the title examination work performed in connection with the closing of properties during the First Quarter 2022. The Receiver will reduce the amount due to RDP for the First Quarter 2022 by this amount.
- iii. In connection with the accounting provided to the Receiver by KMA, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$8,869.90 for the period of this Application. Copies of KMA's invoices for January, February and March, 2022, are attached as **Exhibit H**.
- iv. In connection with the accounting provided to the Receiver by Miller Kaplan, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$9,604.60. These fees relate to services rendered during the period from the Receiver's Eleventh Fee Application for the first quarter of 2021 (Dkt. 993) through the First Quarter 2022. A copy of Miller Kaplan's invoice is attached as **Exhibit I.**
- v. In connection with the IT services provided to the Receiver by Prometheum, the Receiver respectfully requests compensation for services rendered,

which is an expense in the amount of \$825.00 for the period of this Application. A copy of Prometheum's invoice is attached as **Exhibit J**.

#### b. <u>Source of Funds for Requested Compensation and Expenses.</u>

The Receiver requests that the above compensation and expenses be paid from the Receiver's operating account to the extent there are sufficient funds now or in the future. To the extent funds are insufficient, Receiver requests that a subset of the above compensation and expenses be paid pursuant to the receiver's lien that the Court established in order that receivership property may be used to compensate the Receiver and his counsel for their work. (*See* Court's 10/26/20 Order granting Receiver's lien (Dkt. No. 824) and Court's Order Approving Receiver's Lien for Certain Categories of Expenses (Dkt. No. 1030). *See also discussion* in Section V, *infra*.)

c. <u>Fifteenth Application for Payment of Professional Fees and Expenses.</u>

This is the Receiver's Fifteenth Interim Application.

#### d. <u>Summary of Activity.</u>

A "Summary of Activity," providing the total hours billed and the amount of billing for each person who billed time during the Application period (January 1, 2022 through March 31, 2022) can be found at the end of the Receiver's invoices (Exhibit F) and RDP's invoices (Exhibit G) and on the first page of the KMA invoices (Exhibit H).

#### V. REQUEST FOR RECEIVER'S LIEN

The Receiver again requests that the Court authorize the interim payment of certain of the amounts set forth in this fee petition pursuant to the Receiver's first-priority lien previously ordered and affirmed by the Court. (*See* Dkt. Nos. 824, 1031) Specifically, the Receiver requests authorization for the interim payment of fees for two categories of activity: (1) the preservation, management, and liquidation of certain real estate belonging to the Receivership Estate; and (2)

the implementation and management of an orderly summary claim-priority adjudication process, as previously ordered with respect to the Receiver's prior fee applications. (Dkt. No. 1030)

In its March 14, 2022 Order granting the Receiver's 12th fee application, the Court directed that: "To the extent the Receiver requests that the Court authorize payments of his fees and expenses pursuant to the first-priority receiver's lien in the future, he should include details in each fee application concerning which line items he believes should be covered by the first-priority lien, and the Court will consider them together with the fee applications." (Dkt. 1213 at 8, n.3) Accordingly, the Receiver submits as **Exhibit K-M**<sup>2</sup> to this fee application his proposed allocations of the fees for the Asset Disposition, Business Operations, and Claims billing categories incurred during the First Quarter 2022 to properties in the Estate, which have been made in accordance with the methodology approved by the Court, and requests approval of an interim payment of the approved amount from the accounts established from the sale of the property, subject to any holdback ordered by the Court.<sup>3</sup>

The Receiver's proposed allocations apply the methodology previously authorized by the Court to the invoices comprising the Receiver's and his special counsel's invoices comprising this Fifteenth Fee Application. *See* Dkt. 824 at 5 (finding that "the Receiver's proposed methodology to allocate fees and expenses to individual properties is reasonable"). In summary, this methodology, which the Receiver first submitted with his 7th fee application provides: (i) first,

<sup>&</sup>lt;sup>2</sup> Exhibit K contains a summary by property of the specific and general allocations to each property during the quarter. Exhibit L contains the general allocations which are allocated to the properties pro rata based on their gross sales prices. Exhibit M contains the specific allocation schedules for each property. *See* note 3, *infra*.

<sup>&</sup>lt;sup>3</sup> A May 13, 2022 family emergency has prevented the Receiver's vendor from finalizing and generating Exhibits K, L and M. The Receiver will file the schedules under separate cover as soon as they are available.

allocate by property; (ii) second, do not allocate certain billing categories; (iii) third, do not allocate third-party claims by the Receiver; and (iv) fourth, allocate all remaining fees and expenses to the properties as a percentage of their gross sales prices. (Dkt. No. 755 at 23-24) The institutional lenders have acknowledged that this methodology has been approved by the Court. (Dkt. No. 1188 at 2) ("On October 26, 2020, the Court awarded the Receiver a receiver's lien and approved the Receiver's methodology of allocating that lien among the Properties").

In support of this fee application, the Receiver further incorporates by reference the arguments and legal authority offered in support of his pending Motion for Approval of Allocations of Fees to Properties for Payment Pursuant to Receiver's Lien. (Dkt. No. 1107)

#### VI. CONCLUSION

WHEREFORE, the Receiver respectfully requests that the Court approve the Receiver's Fifteenth Interim Fee Application and enter an Order as follows:

- a. finding the fees and expenses of the Receiver and Receiver's retained professionals, Rachlis Duff & Peel, LLC, KMA S.C., Miller Kaplan Arase LLP, and Prometheum, as described in Exhibits F-J, respectively, to be reasonable and necessary to the Receivership;
- b. granting the Receiver and his retained professional a first priority administrative lien against each of the real estate properties in the Receivership Estate and their sales proceeds for payment of fees and costs;
- c. approve the proposed allocation and payment methodology with respect to a Receiver's lien for all fees and expenses of the Receivership Estate as described and recommended in this fee application;

- d. approving the Receiver's payment of such fees and expenses to the Receiver and to Receiver's retained professionals from sales proceeds for each of the properties in the Receivership Estate as described and recommended in this fee application; and
  - e. granting the Receiver all other relief which this Court deems just and proper.

Dated: May 16, 2022 Kevin B. Duff, Receiver

By: /s/ Michael Rachlis

Michael Rachlis
Jodi Rosen Wine
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#### **RECEIVER'S CERTIFICATION**

- 1. Pursuant to the Billing Instructions, the Receiver certifies as follows regarding the Receiver's Fifteenth Interim Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals:
  - a. The Receiver has read the foregoing Application and Motion;
  - b. To the best of the Receiver's knowledge, information and belief formed after reasonable inquiry, the Application and Motion and all fees and expenses therein are true and accurate and comply with the Billing Instructions (with any exceptions specifically noted in this Certification, Application, and Motion);
  - c. All fees contained in the Application and Motion are based on the rates listed in the Fee Schedule attached hereto as Exhibit A, and such fees are reasonable, necessary, and commensurate with the skill and experience required for the activity performed;
  - d. The Application and Motion does not include in the amount for which reimbursement is sought, the amortization of the cost of any investment, equipment, or capital outlay (except to the extent any such amortization is included within the permitted allowable amounts set forth herein); and
  - e. In seeking reimbursement for a service which the Receiver or the Receiver's Retained Professionals justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), reimbursement is requested only for the amount billed to the Receiver or Receiver's Retained Professionals by the third-party vendor and paid by the Receiver or Receiver's Retained Professionals to such vendor. If such services were performed by the Receiver or Receiver's Retained Professionals, the Receiver certifies that no profit has been made on such reimbursable service.
  - 2. On May 6, 2022, the Receiver provided to Mr. Benjamin Hanauer, of the SEC, a complete draft copy of this Application and Motion, together with exhibits A-J, which include the relevant billing statements in a format specified by the SEC.

Dated: May 16, 2022

/s/ Kevin B. Duff Kevin B. Duff, Receiver EquityBuild, Inc., et al. c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605 (312) 733-3390 - kduff@rdaplaw.net

#### **CERTIFICATE OF SERVICE**

I hereby certify that I provided service of the foregoing Receiver's Fifteenth Interim Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals, via the Court's CM/ECF system, to all counsel of record on May 16, 2022.

/s/ Michael Rachlis

Michael Rachlis Rachlis Duff & Peel, LLC 542 South Dearborn Street, Suite 900 Chicago, IL 60605 Phone (312) 733-3950 Fax (312) 733-3952 mrachlis@rdaplaw.net

## Exhibit A

#### Rachlis Duff & Peel, LLC Rates

Professional/	Position	2022	2022	
Paraprofessional		Standard	Discounted	
		<b>Hourly Rates</b>	<b>Hourly Rates</b>	
Michael Rachlis	RDP Member	\$650	\$390	
Drew G.A. Peel	RDP Member	\$650	\$390	
Ellen Duff	RDP Of Counsel	\$600	\$390	
Andrew E. Porter	RDP Of Counsel	\$600	\$390	
Jodi Rosen Wine	RDP Of Counsel	\$600	\$260	
Kathleen Pritchard	RDP Paralegal	\$225	\$140	
Ania Watychowicz	RDP Paralegal	\$225	\$140	
Justyna Rak	RDP Paralegal	\$225	\$140	
Stoja Zjalic	RDP Legal Assistant	\$190	\$110	

KMA S.C. (f/k/a BrookWeiner) Billing Rates	20% discount from current standard rates	
Staff Accountant	\$110/hour	
Manager	\$210/hour	
Partner	\$275/hour	

#### Prometheum's Hourly Rate

Position	<b>Hourly Rate</b>
Senior Technical Consultant	\$110



#### Schedule of Current Fees With SEC Discounted Rates March 1, 2018

Service provider	Rate, per hour	SEC Discounted rate at 80% of standard, per hour
Administrative Staff	\$35 - \$125	\$28 - \$100
Accounting Staff	\$100 - \$200	\$80 - \$160
Senior Accounting Staff	\$225 - \$275	\$180 - \$220
Attorney	\$250 - \$350	\$200 - \$280
Partner	\$400 - \$550	\$320 - \$440

San Francisco

Los Angeles

Seattle •

Las Vegas •

# Exhibit B

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							Am	ount_			Ap	oroved
	Docket No.		Am	ount of	Docket No.		App	roved	Am	ount Paid	Am	ount Unpaid
Interim Fee Application	Application	Date Filed	App	lication	<u>Order</u>	Date of Order	(less	s holdback)1	(as	of 3/31/22)	(as	of 3/31/22)
First (3d Q 2018)	411	June 12, 2019	\$	413,298.44	546	October 15, 2019	\$	413,298.44	\$	413,298.44	\$	-
Second (4th Q 2018)	487	August 21, 2019	\$	553,968.43	547	October 15, 2019	\$	553,968.43	\$	553,968.43	\$	-
Third (1st Q 2019)	569	November 1, 2019	\$	547,711.44	614	January 7, 2020	\$	547,711.04	\$	547,711.04	\$	-
Fourth (2d Q 2019)	576	November 15, 2019	\$	510,056.64	614	January 7, 2020	\$	510,056.64	\$	23,006.88	\$	487,049.76
Fifth (3d Q 2019)	608	December 20, 2019	\$	485,094.92	710	June 9, 2020	\$	485,094.92	\$	19,563.50	\$	465,531.42
Sixth (4th Q 2019)	626	February 14, 2020	\$	297,791.41	710	June 9, 2020	\$	297,791.41	\$	22,211.40	\$	275,580.01
Seventh (1st Q 2020)	755	July 28, 2020	\$	362,102.16	824	October 26, 2020	\$	362,102.16	\$	11,634.25	\$	350,467.91
Eighth (2d Q 2020)	778	August 28, 2020	\$	451,944.97	824	October 25, 2020	\$	451,944.97	\$	12,152.50	\$	439,792.47
Ninth (3d Q 2020)	885	November 30, 2020	\$	403,064.48	1031	August 17, 2021	\$	324,959.92	\$	1,017.50	\$	323,942.42
Tenth (4Q2020)	945	February 23, 2021	\$	379,388.01	1031	August 17, 2021	\$	304,579.67	\$	6,593.20	\$	297,986.47
Eleventh (1Q2021)	993	May 17, 2021	\$	261,601.20	1031	August 17, 2021	\$	210,660.10	\$	2,750.00	\$	207,910.10
Twelfth (2Q2021)	1026	August 16, 2021	\$	185,528.04	1213	March 14, 2022	\$	149,092.26	\$	-	\$	149,092.26
Thirteenth (3Q2021)	1087	November 15, 2021	\$	155,709.74	n/a							
Fourteenth (4Q2021)	1181	February 14, 2022	\$	151,828.35	n/a							
											\$ 2	2,997,352.82

<sup>&</sup>lt;sup>1</sup>The approved amounts less the 20% holdback ordered by the Court for the Ninth, Tenth, and Eleventh fee applications (Dkt. 1030) have been adjusted since the Receiver's last fee application to account for a 20% holdback of the fees charged by accounting professionals KMA (f/k/a BrookWeiner), Miller Kaplan, and Whitley Penn.

## Exhibit C

### STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis Receivership; Civil Court Docket No. 18-cv-05587 Reporting Period 1/1/2022 to 3/31/2022

		Dotail	Subtotal	Grand Tatal
Line 1	Beginning Balance (As of 1/1/2022):	<u>Detail</u> \$1,019,746.01	Subtotal	<b>Grand Total</b> \$1,019,746.01
rille 1	Increases in Fund Balance:	\$1,015,740.01		\$1,U19,740.UI
Line 2	Business Income			
Line 3	Cash and unliquidated assets	d 520 4 5		
Line 4	Interest/Dividend Income	\$629.15		
Line 5	Business Asset Liquidation			
Line 6	Personal Asset Liquidation			
Line 7	Net Income from Properties	¢100 500 05		
Line 8	Miscellaneous - Other¹	\$106,589.85		ć1 12C 0CE 01
	Total Funds Available (Line 1-8):			\$1,126,965.01
	Decrease in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for receivership operations			
	Disbursements to receiver or Other Profesionals			
	Business Asset Expenses <sup>2</sup>	(\$1,316.00)		
	Personal Asset Expenses			
	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses		\$0.00	
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		(\$1,316.00)	
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisers			
	Tax Advisers			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses		\$0.00	
Line 11b	Distribution Plan Implementation Expenses:			
	1. Fees:			
	Fund Administrator			
		-		

### STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis Receivership; Civil Court Docket No. 18-cv-05587 Reporting Period 1/1/2022 to 3/31/2022

	Distribution Agent			
	Consultants			
	Legal Advisers			
	Tax Advisers			
	2. Administrative Expenses			
	3. Investor identification			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Adminstrator Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursement for Distribution Expenses Paid by the	Fund	\$0.00	
Line 12	Disbursement to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment			
	System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	Total Disbursement to Court/Others:			
	Total Funds Disbursed (Lines 1-12):			(\$1,316.00)
Line 13	Ending Balance (As of 3/31/2022):			\$1,125,649.01
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents			\$1,125,649.01
Line 14b	Investments (unliquidated EquityBuild investments)			
Line 14c	Other Assets or uncleared Funds			
	Total Ending Balance of Fund - Net Assets			\$1,125,649.01

/s/ Kevin B. Duff				
(Signature)				
Kevin B. Duff, Receiver EquityBuild, Inc., et al.				
(Printed Name)				
4/26/2022				

<sup>&</sup>lt;sup>1</sup> Refund of insurance payments for sold properties

<sup>&</sup>lt;sup>2</sup> Payments to vendors for services related to claims document repository - TOTAL \$1,316.00.

# Exhibit D

#### **Master Asset List**

Receiver's Account (as of 3/31/2022)				
Institution	Account Information	Amount		
AXOS Fiduciary Services	Checking #0181	\$936,122.20		
AXOS Fiduciary Services	Checking #0348	\$189,526.81		
		Total:		
		\$1,125,649.01		

	Receivership Defendants' Accounts				
Institution	Account Information	Current Value	Amount Transferred to Receiver's Account		
Wells Fargo	Checking (53 accounts in the names of the affiliates and affiliate entities included as Receivership Defendants)		\$190,184.131		
Wells Fargo	Checking (account in the names of Shaun Cohen and spouse)		\$23,065.432		
Byline Bank	Checking (2 accounts in names of Receivership Defendants)	\$21,851.013			
			Total:		
			\$213,249.56		

#### **EquityBuild Real Estate Portfolio**

For a list of the properties within the EquityBuild portfolio identified by property address, alternative address (where appropriate), number of units, and owner, *see* Exhibit 1 to the Receiver's First Status Report, Docket No. 107. See also Exhibit 6 hereto.

Other, Non-Illinois Real Estate				
Description	Appraised Market Value			
Single family home in Plano, Texas	±\$450,000.00			
	Approximate mortgage amount: \$400,000.00 Approximate value less mortgage: \$50,000.00			

<sup>&</sup>lt;sup>1</sup> This amount reflects the total value of all of the frozen bank accounts held by Wells Fargo that were transferred to the Receiver's account; the final transfer was made on 1/22/20, and included as part of the Receiver's Account as of 3/31/20.

<sup>&</sup>lt;sup>2</sup> This amount was transferred to the Receiver's Account as of 8/27/18, and is included as part of the total balance of the Receiver's Account as of 3/31/19.

<sup>&</sup>lt;sup>3</sup> The Receiver is investigating whether these accounts are properly included within the Receivership Estate.

# Exhibit E

#### SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

#### Balances of Funds in Property Specific Accounts as of March 31, 2022

Assount Number	Account Name	Account Balance	Data of Cattlement	Reason for Change (if any)
Account Number	Account Name	(as of March 31, 2022)	Date of Settlement	1/1/22 - 3/31/22
0025	7301 S Stewart Ave	\$303,619.54	11/4/2019	Interest earned, \$187.10
0033	5001-05 S Drexel	\$2,727,811.25	5/22/2019	Interest earned, \$1,681.00
0041	7927-49 S Essex	\$644,875.36	5/1/2019	Interest earned, \$397.41
0058	8100-14 S Essex	\$929,491.79	4/30/2019	Interest earned, \$572.80
0066	6160-6212 S King	\$430,195.19		Interest earned, \$265.11
0074	1102 Bingham	\$701,577.85	10/6/2021	Interest earned, \$462.34
0108	8047 S. Manistee	\$806,459.56	2/5/2020	Interest earned, \$496.98
0116	5955 S. Sacramento	\$450,388.38		Interest earned, \$277.55
0124	6001-05 S. Sacramento	\$329,360.17		Interest earned, \$202.97
0132	7026-42 S. Cornell	\$868,691.54		Interest earned, \$535.33
0140	7237-43 S. Bennett	\$683,662.14		Interest earned, \$421.31
0157	7834-44 S. Ellis	\$1,637,627.80		Interest earned, \$1,009.18
0165	701-13 S. 5th Avenue	\$616,829.23		Interest earned, \$380.12
0199	7625 S. East End	\$1,242,528.57		Interest earned, \$765.70
0207	7635 S. East End	\$1,049,536.10		Interest earned, \$646.78
0215	7748 S. Essex	\$1,187,301.07		Interest earned, \$731.67
0223	7750 S. Muskegon	\$409,813.69		Interest earned, \$252.55
0231	7749-59 S. Yates	\$639,489.64		Interest earned, \$394.08
0249	7450 S. Luella	\$198,503.84		Interest earned, \$122.33
0256	4520-26 S. Drexel	\$6,208,378.96		Interest earned, \$3,825.89
0264	6749-59 S. Merrill	\$1,410,897.67		Interest earned, \$869.46
0272	7110 S. Cornell	\$1,170,844.54		Interest earned, \$721.52
0280	7109 S. Calumet	\$1,406,341.79	2/28/2022	Proceeds from sale of property, \$1,394,792.47; title
				company refund for overpayment of property taxes,
				\$11,018.16; interest earned, \$307.01
0298	7600 S. Kingston	\$1,408,731.80		Interest earned, \$868.12
0306	7656 S. Kingston	\$235,222.46		Interest earned, \$144.95
0314	8201 S. Kingston	\$275,232.63		Interest earned, \$169.61
0322	8326-58 S. Ellis	\$1,334,529.92		Interest earned, \$822.40
0330	6949-59 S. Merrill	\$1,543,725.22		Interest earned, \$951.32
0355	7546 S. Saginaw	\$523,554.97		Interest earned, \$322.63
0363	638 N. Avers	\$628,903.62		Interest earned, \$387.56
0371	5450 S. Indiana	\$1,794,471.70		Interest earned, \$1,105.83
0389	6437 S. Kenwood	\$1,343,939.33	• •	Interest earned, \$828.20
0397	7300 S. St. Lawrence	\$310,565.50		Interest earned, \$191.39
0405	7760 S. Coles	\$123,225.65		Interest earned, \$75.93
0413	8000 S. Justine	\$193,540.11		Interest earned, \$119.27
0421* 0439	8107-09 S. Ellis	\$111,217.84		Interest earned, \$68.53 Interest earned, \$162.76
0447	8209 S. Ellis 8214-16 S. Ingleside	\$264,128.75 \$209,510.88		Interest earned, \$102.76
0454	11117 S. Longwood	\$1,694,893.04		Interest earned, \$1,044.47
0462	1700 Juneway	\$2,776,998.52		Interest earned, \$1,044.47
0470	1131-41 E. 79th	\$1,180,966.54		Interest earned, \$727.76
0488	2736 W. 64th	\$380,686.60		Interest earned, \$234.60
0496	3074 Cheltenham	\$1,015,992.60		Interest earned, \$234.00
0504	5618 S. Martin Luther King	\$627,794.68		Interest earned, \$386.87
0512	6250 S. Mozart	\$909,612.02		Interest earned, \$560.55
0520	6355 S. Talman	\$479,776.00		Interest earned, \$295.66
0538	6356 S. California	\$316,002.91		Interest earned, \$194.74
0546	6554-58 S. Vernon	\$541,892.54		Interest earned, \$333.94
0553	7051 S. Bennett	\$477,428.59		Interest earned, \$294.21
0561	7201 S. Constance	\$963,702.51		Interest earned, \$593.87
0579	7201-07 S. Dorchester	\$421,928.27		Interest earned, \$260.01
0587	7508 S. Essex	\$749,286.40		Interest earned, \$461.75
0595	7957 S. Marquette	\$285,195.26		Interest earned, \$175.75
0603	4533 S. Calumet	\$2,200,688.66	12/1/2020	Interest earned, \$1,356.17
0611	1017 W. 102nd	\$105,863.28	5/26/2021	Interest earned, \$65.24

#### SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

#### Balances of Funds in Property Specific Accounts as of March 31, 2022

Account Number	Account Name	Account Balance	Date of Settlement	Reason for Change (if any)
0020	1516 5 05+b	(as of March 31, 2022)	F /26 /2024	1/1/22 - 3/31/22
0629	1516 E. 85th	\$110,045.63		Interest earned, \$67.82
0637	417 Oglesby	\$101,723.92		Interest earned, \$62.68
0645	7922 S. Luella	\$143,003.49		Interest earned, \$88.12
0652	7925 S. Kingston	\$88,152.81		Interest earned, \$54.32
0660	8030 S. Marquette	\$80,974.60		Interest earned, \$49.90
0678	8104 S. Kingston	\$150,323.52		Interest earned, \$92.63
0686	8403 S. Aberdeen	\$115,636.15		Interest earned, \$71.26
0694	8405 S. Marquette	\$113,278.65		Interest earned, \$69.81
0702	8529 S. Rhodes	\$134,511.82		Interest earned, \$82.90
0710	9212 S. Parnell	\$98,517.21	, ,	Interest earned, \$60.72
0728	10012 S. LaSalle	\$87,560.13		Interest earned, \$53.96
0736	11318 S. Church	\$126,557.36		Interest earned, \$77.99
0744	6554 S. Rhodes	\$87,276.04		Interest earned, \$53.78
0751	6825 S. Indiana	\$127,500.54		Interest earned, \$78.57
0769	7210 S. Vernon	\$61,534.76		Interest earned, \$37.92
0777	7712 S. Euclid	\$131,005.28		Interest earned, \$80.73
0785	8107 S. Kingston	\$98,208.15		Interest earned, \$60.52
0793	8346 S. Constance	\$136,215.88		Interest earned, \$83.95
0801	8432 S. Essex	\$134,403.74		Interest earned, \$82.82
0819	8517 S. Vernon	\$133,224.66		Interest earned, \$82.10
0827	2129 W. 71st	\$64,111.90		Interest earned, \$39.51
0835	9610 S. Woodlawn	\$87,793.56		Interest earned, \$54.11
0843	1401 W. 109th	\$56,469.50		Interest earned, \$34.80
0850	1139 E. 79th	\$3,717.61		Interest earned, \$2.29
0868	4611 S. Drexel	\$4,936,153.63		Interest earned, \$3,041.88
0876	6217 S. Dorchester	\$2,212,786.63		Interest earned, \$1,363.62
0884	7255 S. Euclid	\$1,070,000.77		Interest earned, \$659.39
0892	7024 S. Paxton	\$1,834,284.66		Interest earned, \$1,130.37
0900*	4317 S. Michigan	\$813,826.39		Interest earned, \$501.52
0918	7701 S. Essex	\$733,290.57	11/16/2020	Interest earned, \$451.89
0926	816 E. Marquette	\$823,517.57	11/18/2020	Interest earned, \$507.49
0934	1422 E. 68th	\$449,972.30	6/23/2021	Interest earned, \$277.30
0942	2800 E. 81st	\$445,331.52	4/30/2021	Interest earned, \$274.44
0959	4750 S. Indiana	\$739,935.57	4/21/2021	Interest earned, \$455.99
0967	7840 S. Yates	\$364,627.32	4/23/2021	Interest earned, \$224.70
0975	7442-48 S. Calumet	\$541,866.75	11/16/2020	Interest earned, \$333.92
0983	431 E. 42nd Place	\$64,987.88	11/5/2020	Interest earned, \$40.05
0991	1414 E. 62nd Place	\$35,158.37	5/26/2021	Refund of closing costs, \$2.00; interest earned,
				\$21.67
1007	2136 W. 83rd Street	\$101,844.45	5/26/2021	Interest earned, \$62.76
1015	7933 S. Kingston	\$95,720.68	5/26/2021	Interest earned, \$58.99
1023	8800 S. Ada	\$127,147.47	5/26/2021	Interest earned, \$78.36
1031	3213 S. Throop	\$137,645.55	5/26/2021	Interest earned, \$84.83
1049	3723 W. 68th Place	\$124,285.23	5/26/2021	Interest earned, \$76.59
1056	406 E. 87th Place	\$99,792.84	5/26/2021	Interest earned, \$61.49
1064	61 E. 92nd Street	\$103,450.71	5/26/2021	Interest earned, \$63.75
1072	7953 S. Woodlawn	\$128,692.72	5/26/2021	Interest earned, \$79.31
1080	5437 S. Laflin	\$45,807.48	5/26/2021	Interest earned, \$28.23
1098	6759 S Indiana	\$90,308.52	5/26/2021	Interest earned, \$55.66
1106	310 E 50th Street	\$189,265.67	5/26/2021	Interest earned, \$116.64
1114	6807 S. Indiana	\$122,274.07		Interest earned, \$75.35
	TOTAL FUNDS HELD:	\$70,387,156.70		

## Exhibit F

### Case: 1:18-cv-05587 Document #: 1251 Filed: 05/16/22 Page 36 of 162 PageID #:65631 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

May 3, 2022

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No. 6621142

Legal Fees for January 2022 \$14,391.00

Expenses Disbursed \$0.00

Due this Invoice \$14,391.00

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description
Asset Analysis & R	ecover	<u>y</u>	
1/6/2022	KBD	0.10	Confer with K. Pritchard regarding third-party subpoena.
			Asset Analysis & Recovery
1/20/2022	KBD	0.30	Exchange correspondence regarding subpoenas and compliance (.1); exchange correspondence with A. Watychowicz regarding communication from former EB vendor (.2).
			Asset Analysis & Recovery
1/21/2022	KBD	0.10	Exchange correspondence with A. Watychowicz regarding preservation of domain records.
			Asset Analysis & Recovery
1/22/2022	KBD	0.20	Exchange correspondence with J. Wine regarding information requested by counsel in third party action.
			Asset Analysis & Recovery
1/25/2022	KBD	0.20	Confer with government representative.
			Asset Analysis & Recovery
SUBTOTAL:			[ 0.90 351.00]
Asset Disposition			
1/3/2022	KBD	0.20	Exchange correspondence with claimant's counsel regarding confirmation relating to purported letter of credit (7109 Calumet) (.1); exchange correspondence with A. Watychowicz regarding motion to approve sale (7109 Calumet) (.1).
			Asset Disposition
1/17/2022	KBD	0.20	Exchange correspondence with J. Rak and J. Wine regarding confirmation of funds transfer (single family).
			Asset Disposition
1/21/2022	KBD	0.20	Exchange correspondence with J. Wine and A. Porter regarding order granting motion to confirm sale (7109 Calumet).
			Asset Disposition
1/24/2022		0.40 =	xchange correspondence with J. Rak regarding post-sale reconciliation of
	KBD	U.4U E	expenses (638 Avers) (.3); exchange correspondence with A. Porter and J. Rak regarding closing of sale (7109 Calumet) (.1).

	<u>Date</u>	Indiv	Hours	Description	
SUBTO	ΓAL:			[ 1.00 39	0.00]
<u>Busines</u>	s Operations	;			
	1/4/2022	KBD	0.30	Exchange correspondence regarding property survey invoice (7635 East Er (.1); exchange correspondence regarding motion to intervene (defer) (.2).	nd)
				Business Operations	
	1/5/2022	KBD	0.40	Confer with E. Duff regarding insurance premium recovery and allocation issues (all).	
				Business Operations	
	1/10/2022	KBD	0.10	Exchange correspondence with J. Wine regarding insurance coverage determination (4533 Calumet).	
				Business Operations	
	1/11/2022	KBD	0.80	Confer with and review correspondence from E. Duff regarding insurance recovery and allocation issues (all) (.5); draft correspondence to K. Pritchard regarding insurance renewal, termination, and potential refunds (all) (.1); exchange correspondence with J. Wine and K. Pritchard regarding background on and records for expenses for allocation (1414 E 62nd; 6160 MLK; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7749 Yates; 7834 Ellis; 8201 Kingston) (.1); exchange correspondence with J. Wine regarding property expense and inclusion in expense restoration and approval motion (6217 Dorchester) (.1).	
				Business Operations	
	1/12/2022	KBD	0.80	Telephone conference with J. Wine regarding property expense allocation and restoration and study related spreadsheet (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiar 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis) (.7); attention to correspondence regarding trial in state court proceeding (7748 Essex) (.1).	ıa;

**Business Operations** 

Date	Indiv	Hours	Description
1/13/2022	KBD	0.80	Telephone conference with insurance broker regarding urgent need for endorsements and refunds (all) (.3); confer with E. Duff regarding expense accounting and restoration reports (all) (.3); study revised order and exchange related correspondence (defer) (.2).
			Business Operations
1/19/2022	KBD	0.20	Exchange correspondence with J. Wine and M. Rachlis regarding state court litigation (4533 Calumet).
			Business Operations
1/20/2022	KBD	0.30	Exchange correspondence with J. Wine and M. Rachlis regarding state court action (4533 Calumet).
			Business Operations
1/21/2022	KBD	0.20	Exchange correspondence with A. Watychowicz regarding corporate status issue (defer) (.1); attention to issue relating to pending litigation (4533 Calumet) (.1).
			Business Operations
1/22/2022	KBD	0.20	Draft correspondence to J. Wine regarding issue relating to state court action (4533 Calumet) (.1); draft correspondence regarding property accounting (638 Avers) (.1).
			Business Operations
1/24/2022	KBD	0.20	Exchange correspondence with J. Wine and M. Rachlis regarding stay of state court action (4533 Calumet) (.1); confer with K. Pritchard regarding property expenses and accounting (7109 Calumet) (.1).
			Business Operations
1/25/2022	KBD	0.20	Confer with M. Rachlis and J. Wine and review related correspondence from J. Wine regarding state court action (4533 Calumet).
			Business Operations
1/28/2022	KBD	0.10	Study correspondence from E. Duff regarding efforts to obtain information from property insurance carrier through insurance broker and recover premium refunds (5001 Drexel; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 1401 W 109th; 310 E 50th; 6807 Indiana; 7327 Bennett; 6217 Dorchester; 7255 Euclid).
			Business Operations

	Date	Indiv	<u>Hours</u>	Description		
	1/31/2022	KBD	0.70	Attention to correspondence with J. Wine and K. Pritch court litigation and insurance issues (7748 Essex; 1700 confer with and study correspondence from J. Wine reg communication with state court counsel regarding case (.2); study correspondence from property manager reg inspection issue and required repairs and exchange correspondence regarding communication with purchaser of property.	O Juneway) (.3 parding e status (7748 arding CHA prespondence	B); Essex) with A.
				Business Operations		
SUBTOT	AL:				[ 5.30	2067.00]
Case Ad	ministration		<u>—</u>			
	1/12/2022	KBD	0.10	Study correspondence from A. Watychowicz regarding deadlines.	schedule and	
				Case Administration		
	1/13/2022	KBD	1.50	Attention to issues regarding EB records, database, ar correspondence (.3); telephone conference with govern (.7); exchange correspondence and telephone confere email issue related to documents database (.2); confer Watychowicz regarding EB email issue related to docu	ment represer nce regarding ence with A.	ntatives EB
				Case Administration		
	1/14/2022	KBD	0.70	Confer with A. Watychowicz and J. Rak regarding EB retelephone conference with J. Wine regarding EB record communications with database vendor about database issues (.1).	ds issue and	
				Case Administration		
	1/15/2022	KBD	1.50	Work on document upload for vendor review and relate various related communications with A. Watychowicz.	d issues and	
				Case Administration		
	1/17/2022	KBD	0.10	Study correspondence from EB documents database ve evaluation of records.	endor regardin	ng
				Case Administration		
	1/18/2022	KBD	0.40	Exchange correspondence and telephone conferences Watychowicz regarding EB documents issues (.2); exclusive correspondence with government representatives (.2).		and A.
				Case Administration		

<u>Date</u>	Indiv	Hours	Description
1/19/2022	KBD	0.60	Exchange correspondence with J. Wine regarding claimants' counsel's request for records (.1); confer with government representatives (.5).
			Case Administration
1/24/2022	KBD	0.20	Confer with J. Wine and M. Rachlis regarding claimant request for information.
			Case Administration
1/31/2022	KBD	0.20	Confer with J. Wine and M. Rachlis regarding EB records database and related vendor issues.
			Case Administration
SUBTOTAL:			[ 5.30

1	/3/2022	KBD	1.00	Work on position statement template and accompanying correspondence to claimants and exchange related correspondence J. Wine and M. Rachlis (Group 1) (.4); study claimants' motion for clarification of order and exchange related correspondence with M. Rachlis and J. Wine (sole lien) (.5); exchange correspondence with A. Watychowicz regarding communication with claimant relating to claims process activities (all) (.1).
				Claims Administration & Objections
1	/4/2022	KBD	0.70	Study and revise communication to claimants about position statement and exchange various related correspondence (Group 1) (.5); exchange correspondence regarding claimant inquiry about available funds for distribution (all) (.1); exchange correspondence with J. Wine and M. Rachlis regarding communication relating to rebuttal expert (Group 1) (.1).
				Claims Administration & Objections
1	/5/2022	KBD	0.30	Exchange correspondence with J. Wine regarding claimant's response to discovery requests (sole lien) (.1); exchange correspondence with J. Wine and A. Watychowicz regarding claimant position statements, service issue, and communication with claimants (Group 1) (.1); exchange correspondence with J. Wine regarding communication regarding expert discovery (Group 1) (.1).
				Claims Administration & Objections

Date	Indiv	Hours	Description
1/6/2022	KBD	0.50	Telephone conference with SEC (Group 1) (.1); study draft avoidance disclosure and related correspondence (Group 1) (.3); confer with J. Wine and M. Rachlis regarding avoidance disclosure (Group 1) (.1).
			Claims Administration & Objections
1/7/2022	KBD	3.10	Study and revise several drafts of avoidance disclosure and exchange various related correspondence (Group 1).
			Claims Administration & Objections
1/10/2022	KBD	0.80	Telephone conference with SEC regarding claims-related issue (Group 1) (.1); exchange correspondence with A. Watychowicz regarding communication with claimants regarding disclosure statement (Group 1) (.1); exchange correspondence with A. Watychowicz regarding communication with claimant regarding claims and potential distribution issues (all) (.2); study draft response to motion for clarification and exchange related correspondence with J. Wine (sole lien) (.3); study discovery responses (1017 W 102nd Street; 1516 E 85th Place; 2136 W 83rd Street; 417 Oglesby Avenue; 7922 S Luella Avenue; 8030 S Marquette Avenue; 8104 S Kingston Avenue; 8403 S Aberdeen Street; 8529 S Rhodes Avenue; 11318 S Church Street; 2129 W 71st Street; 7925 S Kingston Avenue; 9212 S Parnell Avenue; 7210 S Vernon Avenue; 6825 S Indiana Avenue; 406 E 87th Place; 6554 S Rhodes Avenue; 7712 S Euclid Avenue; 8432 S Essex Avenue; 3213 S Throop Street; 8107 S Kingston Avenue; 8346 S Constance Avenue; 10012 S LaSalle Avenue; 9610 S Woodlawn Avenue; 6759 S Indiana Avenue; 8517 S Vernon Avenue) (.1).
			Claims Administration & Objections
1/11/2022	KBD	1.00	Study and revise draft response to claimants' motion for clarification and exchange related correspondence with M. Rachlis and J. Wine (sole lien).
			Claims Administration & Objections
1/12/2022	KBD	0.70	Review correspondence from J. Wine and additional related correspondence regarding claims against properties (1131 E 79th; 7024 Paxton) (.2); study revised response to motion for clarification and exchange related correspondence with M. Rachlis, J. Wine, and A. Watychowicz (sole lien) (.4); exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant regarding position statement (Group 1) (.1).
			Claims Administration & Objections
1/14/2022	KBD	0.10	Review claimant's motion to take discovery (Group 1).
			Claims Administration & Objections
1/16/2022	KBD	0.20	Draft correspondence to K. Pritchard regarding potential claims (all).

<u>Date</u>	<u>Indiv</u>	Hours	Description
1/18/2022	KBD	0.60	Telephone conference with J. Wine regarding EB records database issue and potential additional discovery (Group 1) (.3); exchange correspondence with K. Pritchard regarding confirmation of information relating to claims against properties (3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 6749 Merrill; 7110 Cornell; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.2); exchange correspondence with J. Wine, M. Rachlis, and A. Porter regarding scheduling relating to claimant's discovery motion (Group 1) (.1).
			Claims Administration & Objections
1/19/2022	KBD	2.20	Confer with M. Rachlis, J. Wine, and A. Porter regarding discovery issues (Group 1) (1.8); further exchange correspondence with J. Wine and M. Rachlis regarding discovery issues and review transcripts (Group 1) (.4).
			Claims Administration & Objections
1/20/2022	KBD	1.90	Prepare for hearing before Judge Lee (Group 1) (.2); appear before Judge Lee on claimant's motion for additional discovery (Group 1) (.3); exchange correspondence with A. Watychowicz regarding communication with claimant regarding claims process (all) (.1); telephone conference and exchange correspondence with M. Rachlis regarding discovery issues (Group 1) (.4); study correspondence from J. Wine regarding recorded documents and operative instruments (Group 1) (.1); study and revise draft order and exchange related correspondence (Group 1) (.3); exchange correspondence regarding transcript (Group 1) (.1); exchange correspondence with J. Wine and M. Rachlis regarding production of bank records to claimant and related proposed order (Group 1) (.4).
4/04/0000	KDD	0.20	•
1/21/2022	KBD	0.30	Exchange correspondence with J. Wine regarding claimant communication, position statement, and deposition (Group 1) (.1); exchange correspondence with A. Porter and J. Wine regarding production of bank statement (Group 1) (.1); study claimant's contention interrogatories (Group 1) (.1).
			Claims Administration & Objections
1/24/2022	KBD	0.90	Study and revise and exchange related correspondence with J. Wine and M. Rachlis (Group 1) (.4); exchange correspondence with claimants regarding claims process related communications (all) (.3); study J. Wine analysis of claim submissions and subpoena responses (sole lien) (.2).
			Claims Administration & Objections

Date Indiv Hours Description

1/25/2022 KBD

2.40 Confer with M. Rachlis and J. Wine regarding discovery issues and analysis of claims (sole lien) (.9); confer with M. Rachlis and J. Wine regarding position statement planning (Group 1) (.3); confer with M. Rachlis and J. Wine regarding EB records database (all) (.2); exchange correspondence with J. Wine regarding claims spreadsheet and related issues (sole lien) (.1); exchange correspondence with A. Watychowicz and J. Wine regarding communication with claimants regarding claims process and timing (all) (.2); study analysis of lien data relating to most single claim properties (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.2); study claimants' position statement (Group 1) (.5).

Claims Administration & Objections

1/26/2022 KBD

0.80 Review claimant position statement and exchange related correspondence regarding logistics of sharing position statements with claimants (Group 1) (.3); study analysis of claims and exchange related correspondence (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.2); study analysis of claims (7110 Cornell; 6751 Merrill) (.3).

Claims Administration & Objections

1/27/2022 KBD

2.90 Confer with M. Rachlis and J. Wine regarding sole lien process discovery and analysis of related issues (sole lien) (.9); exchange correspondence with A. Watychowicz regarding communication with claimants regarding hearing information (Group 1) (.1); study participants' position statements (Group 1) (1.7); attention to various correspondence regarding hearing and schedule (sole lien) (.2).

Claims Administration & Objections

**KBD** 0.10 Exchange correspondence with A. Watychowicz regarding communication with potential claimant regarding timely submission of claim (7500 Eggleston; 7549 Essex; 8100 Essex; 6160 MLK; 7927 Essex; 7933 Essex; 7937 Essex; 7943 Essex; 7947 Essex; 5001 Drexel; 7301 Stewart; 7834 Ellis; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 3030 E 79th; 2909 E 78th; 7748 Essex; 8047 Manistee; 701 S 5th; 7749 Yates; 6749 Merrill; 7450 Luella; 7546 Saginaw; 8201 Kingston; 4520 Drexel; 8326 Ellis; 8334 Ellis; 8342 Ellis; 8352 Ellis; 5450 Indiana; 6437 Kenwood; 7760 Coles; 8000 Justine; 8107 Ellis; 8214 Ingleside; 8209 Ellis; 11117 Longwood; 7300 St Lawrence; 7110 Cornell; 7957 Marquette; 7051 Bennett; 2736 W 64th; 6356 California; 6355 Talman; 5618 MLK; 6554 Vernon; 1700 W Juneway; 7201 Dorchester: 7508 Essex: 431 E 42nd: 7701 Essex: 7442 Calumet: 816 E Marquette; 6949 Merrill; 4533 Calumet; 4315 Michigan; 7600 Kingston; 7656 Kingston; 1131 E 79th; 6250 Mozart; 4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136

W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030

#### Date Indiv Hours Description

Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester; 1102 Bingham; 638 N Avers; 7109 Calumet).

#### Claims Administration & Objections

1/28/2022 KBD

0.10 Exchange correspondence regarding hearing and schedule (all) (.1); exchange further correspondence with A. Watvchowicz regarding communication with potential claimant regarding timely submission of claim (7500 Eggleston; 7549 Essex; 8100 Essex; 6160 MLK; 7927 Essex; 7933 Essex; 7937 Essex; 7943 Essex; 7947 Essex; 5001 Drexel; 7301 Stewart; 7834 Ellis; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 3030 E 79th; 2909 E 78th; 7748 Essex; 8047 Manistee; 701 S 5th; 7749 Yates; 6749 Merrill; 7450 Luella; 7546 Saginaw; 8201 Kingston; 4520 Drexel; 8326 Ellis; 8334 Ellis; 8342 Ellis; 8352 Ellis; 5450 Indiana; 6437 Kenwood; 7760 Coles; 8000 Justine; 8107 Ellis; 8214 Ingleside; 8209 Ellis; 11117 Longwood; 7300 St Lawrence; 7110 Cornell; 7957 Marquette; 7051 Bennett; 2736 W 64th; 6356 California; 6355 Talman; 5618 MLK; 6554 Vernon; 1700 W Juneway; 7201 Dorchester; 7508 Essex; 431 E 42nd; 7701 Essex; 7442 Calumet: 816 E Marquette: 6949 Merrill: 4533 Calumet: 4315 Michigan: 7600 Kingston; 7656 Kingston; 1131 E 79th; 6250 Mozart; 4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7255 Euclid; 7237 Bennett: 6217 Dorchester: 1102 Bingham: 638 N Avers: 7109 Calumet).

#### Claims Administration & Objections

**KBD** 1.50 Review correspondence from J. Wine regarding subpoena issue and related correspondence with claimant's counsel (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.1); study participants' position statements (Group 1) (.7); exchange correspondence regarding hearing and schedule (all) (.1); exchange correspondence with M. Rachlis and J. Wine regarding Receiver submission on claims (Group 1) (.3); study correspondence from M. Rachlis and J. Wine regarding discovery issues and claims analysis (sole lien) (.2); study correspondence from K. Pritchard regarding potential claims by tax authorities relating to properties (1017 W 102nd; 417 Oglesby; 7925 S Kingston; 8403 S Aberdeen; 9212 S Parnell; 1516 E 85th PI; 2136 W 83rd; 7922 S Luella; 7933 S Kingston; 8030 S Marquette; 8104 S Kingston; 8529 S Rhodes) (.1).

	Date	Indiv	<u>Hours</u>	Description	_	
	1/31/2022	KBD	0.40	Exchange correspondence with A. Watychowicz regard with claimant regarding valuation of properties (all) (.1); correspondence regarding claimants' request for access (all) (.2); exchange correspondence with A. Watychowic communications regarding database access inquiry (all	exchange s to electronic r z regarding clai	ecords
				Claims Administration & Objections		
SUBTO	AL:				[22.50	8775.00]
Status R	eports					
	1/11/2022	KBD	0.10	Draft correspondence to J. Wine regarding state court li	tigation update.	
				Status Reports		
	1/21/2022	KBD	0.30	Study correspondence and draft status report from J. W	'ine.	
				Status Reports		
	1/25/2022	KBD	0.60	Study and revised draft status report.		
				Status Reports		
	1/30/2022	KBD	0.10	Exchange correspondence with A. Watychowicz and K. filing status report.	Pritchard regard	ding
				Status Reports		
	1/31/2022	KBD	0.40	Study draft status report and exchange related correspo	ndence.	
				Status Reports		
SUBTO	AL:				[ 1.50	585.00]
Tax Issu	es					
	1/6/2022	KBD	0.10	Attention to notice from collection agency.		
				Tax Issues		
	1/20/2022	KBD	0.10	Exchange correspondence with K. Pritchard regarding or IRS.	correspondence	from
				Tax Issues		
	1/28/2022	KBD	0.20	Study correspondence from K. Pritchard and spreadshe and status of tax authority and collection notices.	et tracking rece	eipt
				Tax Issues		

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<u>Date</u>	Indiv Hours Description		
SUBTOTAL:		[ 0.40	156.00]
		36.90	\$14,391.00
	Summary of Activity		
Kevin B. Duff		Hours Rate 36.90 390.00	\$14.391.00

### **SUMMARY**

Legal Services	\$14,391.00
Other Charges	\$0.00
TOTAL DUE	\$14,391.00

# Case: 1:18-cv-05587 Document #: 1251 Filed: 05/16/22 Page 49 of 162 PageID #:65644 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

May 3, 2022

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No. 6621143

Legal Fees for February 2022 \$22,191.00

Expenses Disbursed \$0.00

Due this Invoice \$22,191.00

	<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description
Asset Ana	alysis & Re	covery	<u>'</u>	
	2/3/2022	KBD	0.10	Attention to communication with claimant regarding potential information that may assist recovery efforts.
				Asset Analysis & Recovery
	2/10/2022	KBD	0.40	Telephone conference with government representative (.2); draft correspondence to and telephone conference with A. Watychowicz regarding records for potential recovery (.2).
				Asset Analysis & Recovery
	2/11/2022	KBD	0.20	Study trial subpoena for documents and exchange related correspondence with A. Watychowicz.
				Asset Analysis & Recovery
	2/15/2022	KBD	0.20	Exchange correspondence with government representative.
				Asset Analysis & Recovery
	2/18/2022	KBD	0.10	Attention to response to subpoena and exchange related correspondence.
				Asset Analysis & Recovery
	2/21/2022	KBD	1.60	Study records for production in response to subpoena and various related communications with A. Watychowicz.
				Asset Analysis & Recovery
	2/22/2022	KBD	0.60	Work on response to subpoena and exchange various related correspondence.
				Asset Analysis & Recovery
SUBTOTA	AL:			[ 3.20 1248.00]
Asset Dis	position			
	2/1/2022	KBD	0.30	Exchange correspondence with A. Porter regarding communication from property manager relating to CHA inspection and property repair issue and exchange related correspondence with property manager (7109 Calumet).
				Asset Disposition
	2/2/2022	KBD	0.10	Draft correspondence to J. Wine regarding information relating to resolution of letter of credit issue to aid communication with lender's counsel (7109 Calumet).

<u>Dat</u>	e	Indiv	<u>Hours</u>	Description		
				Asset Disposition		
2/3.	/2022	KBD	0.10	Exchange correspondence with A. Porter and property maproperty improvement issue and communication with pure Calumet).		ng
				Asset Disposition		
2/6	/2022	KBD	0.10	Work on amendment to purchase and sale agreement and correspondence with A. Porter (7109 Calumet).	d exchange rela	ated
				Asset Disposition		
2/7	/2022	KBD	0.10	Attention to new communication from lender's counsel reg credit issue and exchange related correspondence with N Calumet).		
				Asset Disposition		
2/9	/2022	KBD	0.10	Review and exchange correspondence with lender's coun broker regarding sale of property and payment of taxes (7		
				Asset Disposition		
2/1	1/2022	KBD	0.20	Attention to further communication from lender's counsel credit issue and exchange correspondence with M. Rachli background and resolution of same (7109 Calumet) (.1); correspondence with M. Rachlis regarding lender commuletter of credit issue (7109 Calumet) (.1).	s regarding exchange	
				Asset Disposition		
2/1	5/2022	KBD	0.20	Confer with M. Rachlis and A. Porter regarding claimant's termination of purported letter of credit and exchange relation (7109 Calumet).		ence
				Asset Disposition		
2/2	8/2022	KBD	0.90	Work on closing for sale of property, including review of c and communications with A. Porter, J. Rak, and title comp (7109 Calumet).		
				Asset Disposition		
SUBTOTAL:				_	2.10	819.00]
Business Op	<u>erations</u>		_			
2/2/	/2022	KBD	0.50	Exchange correspondence with J. Wine regarding state of insurance issue (1700 Juneway) (.1); exchange correspondence A. Porter regarding potential property improvement to and communication with property manager regarding same (.4).	ndence with J. o retain CHA tei	Rak nant
				Business Operations		

<u>Date</u>	Indiv	<u>Hours</u>	Description		
2/4/2022	KBD	0.10	Review correspondence regarding stay of state court a	ction (4533 Ca	alumet).
			Business Operations		
2/9/2022	KBD	0.10	Attention to stipulation resolving motion to intervene (de	efer).	
			Business Operations		
2/25/2022	KBD	0.20	Study various correspondence from insurance broker regarding insurance premium endorsements for purpo premium refunds (8326 Ellis; 5450 Indiana; 6437 Kenw Justine; 8107 Ellis; 8214 Ingleside; 8209 Ellis; 11117 L Marquette; 3074 Cheltenham; 6558 Vernon).	sės of determi /ood; 7760 Col	ning les; 8000
			Business Operations		
SUBTOTAL:				[ 0.90	351.00]
Claims Administration	on & Ob	jection	<u>s</u>		
2/1/2022	KBD	1.10	Telephone conferences and exchange correspondence regarding issues with vendor production of records to claimants' database access issues (all) (.8); follow up records issue (all) (.2); attention to communication from update on claim (all) (.1).  Claims Administration & Objections	claimant's cour regarding elect	nsel and tronic

0.40 Exchange correspondence with A. Watychowicz and J. Wine regarding communication with claimant regarding position statements (Group 1) (.2);

exchange correspondence regarding response to claimant regarding custodian issue relating to claim (all) (.1); exchange correspondence with J. Wine regarding proposed joint status report on discovery (Group 1) (.1).

Claims Administration & Objections

2/2/2022 KBD

2/3/2022 KBD 0.60 Attention to claimant inquiry relating to change of custodian (all) (.1);

attention to claimant communication regarding claims process and timing for submission of claim (all) (.1); study and revise notice of filing of position statements (Group 1) (.2); exchange correspondence regarding communication with claimants regarding position statements (Group 1) (.1); exchange correspondence with J. Wine regarding efforts to resolve issue

regarding EB documents (all) (.1).

Date	Indiv	Hours	Description
2/4/2022	KBD	0.10	Exchange correspondence with A. Watychowicz and J. Wine regarding response to claimant relating to position statement (Group 1).
			Claims Administration & Objections
2/7/2022	KBD	1.40	Exchange correspondence with M. Rachlis and J. Wine regarding preparation for hearing before Judge Lee (3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 6749 Merrill; 7110 Cornell; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.2); confer with M. Rachlis and J. Wine regarding Group 1 position statement and related analysis and issues (Group 1) (.8); confer with and study related correspondence from M. Rachlis and J. Wine regarding sole lien discovery issues (sole lien) (.3); work with A. Watychowicz on communications with claimant regarding claim and position statement opportunity (Group 1) (.1).
			Claims Administration & Objections
2/8/2022	KBD	1.50	Prepare for hearing before Judge Lee regarding claims discovery and exchange correspondence with M. Rachlis and J. Wine regarding third party discovery status (sole lien) (.4); appear before Judge Lee regarding claims process and discovery (3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 6749 Merrill; 7110 Cornell; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.4); work on communication with claimant regarding potential change of custodian and standard response to similar inquiries (all) (.3); exchange correspondence with J. Wine regarding claimant claim and failure to provide supporting records (Group 1) (.1); review correspondence from J. Wine regarding notes relating to claims submission (Group 1) (.3).
			Claims Administration & Objections
2/9/2022	KBD	0.70	Study draft discovery responses and related correspondence (Group 1) (.6); further attention to communication with claimant regarding change of custodian (all) (.1).
			Claims Administration & Objections
2/10/2022	KBD	3.70	Study and revise discovery responses and exchange various related correspondence (Group 1) (2.5); study correspondence from M. Rachlis and J. Wine regarding receiver submission (Group 1) (.2); study Group 1 investor charts and related correspondence from J. Wine and M. Rachlis (Group 1) (1.0).

<u>Date</u>	Indiv	Hours	Description
2/11/2022	KBD	5.50	Study claims analysis spreadsheet (Group 1) (.5); confer with M. Rachlis, J. Wine, and A. Porter regarding analysis of Group 1 claims and various related issues and development of related spreadsheet for submission (Group 1) (1.7); confer with M. Rachlis, J. Wine, and A. Porter regarding analysis of claims and distribution issues (all) (.3); attention to filing of claimant position statement received after original filing (Group 1) (.1); study records for production (Group 1) (.5); study correspondence and records from J. Wine regarding rollover issue (Group 1) (.2); study revisions to and revise responses to interrogatories and exchange various related correspondence M. Rachlis and J. Wine (Group 1) (2.2).
			Claims Administration & Objections
2/15/2022	KBD	0.40	Exchange correspondence with M. Rachlis and J. Wine regarding deposition request and prior court rulings (Group 1).
			Claims Administration & Objections
2/17/2022	KBD	1.10	Study and revise Group 1 position statement analysis and study related correspondence from M. Rachlis (Group 1).
			Claims Administration & Objections
2/20/2022	KBD	0.10	Exchange correspondence with J. Wine regarding review of claims and position statements analysis (Group 1).
			Claims Administration & Objections
2/21/2022	KBD	4.70	Study and revise analysis of claims (Group 1) (1.8); confer with M. Rachlis and J. Wine regarding analysis of claims (Group 1) (1.0); confer with M. Rachlis and J. Wine regarding claimant's request for deposition (Group 1) (.2); further confer with M. Rachlis and J. Wine regarding claimant's position on need for deposition (Group 1) (.2); telephone conference with M. Rachlis regarding summary proceeding and evidentiary considerations relating to claimant (Group 1) (.4); legal research regarding claims potential recovery issues and draft related correspondence (all) (.8); study deposition testimony regarding claimant and claim (Group 1) (.2); study motion to compel deposition (Group 1) (.1).
			Claims Administration & Objections
2/22/2022	KBD	3.50	Study, revise, and comment on claims and position statement analysis (Group 1) (1.3); confer with M. Rachlis and J. Wine regarding analysis of claims (Group 1) (2.0); exchange correspondence with M. Rachlis regarding response to motion to compel (Group 1) (.2).
			Claims Administration & Objections
2/23/2022	KBD	4.40	Legal research regarding potential claims issue (all) (.5); confer with M. Rachlis, J. Wine, and A. Porter regarding various claims analysis issues and submission to the Court (Group 1) (.6); study, revise, and comment on changes to analysis of claims and various related issues and exchange related correspondence (Group 1) (1.5); study and revise submission on claims (Group 1) (1.8).
			Claims Administration & Objections

<u>Date</u>	Indiv	Hours	Description		
2/24/2022	KBD	9.90	Study and revise multiple drafts of submission on claim exchange various related correspondence with M. Rach Watychowicz (Group 1) (5.1); revise draft response to r deposition and exchange related correspondence with Pritchard (Group 1) (4.5); confer with M. Rachlis and J. claims analysis, submission preparation, and review of cresponses (Group 1) (.3).	hlis, J. Wine notion to co M. Rachlis a Wine regar	, and A. mpel and K. ding
			Claims Administration & Objections		
2/25/2022	KBD	8.40	Work on claims submission narrative and study revision (Group 1) (3.5); study and revise draft response to moti exchange various related correspondence with M. Rack (Group 1) (4.8); exchange correspondence with J. Wine of EB documents and database and communication wit (all) (.1).	ion to compo hlis and K. F regarding c	el and Pritchard lisposition
			Claims Administration & Objections		
2/27/2022	KBD	1.50	Study and revised narrative for submission on claims a accompanying exhibits, and exchange related correspondent and J. Wine (Group 1) (1.4); exchange correspondent grading claimant lien issue (Group 1) (.1).	ondence with	n M.
			Claims Administration & Objections		
2/28/2022	KBD	1.70	Review various drafts of claims submission and exhibit various related correspondence with J. Wine, M. Rachli Watychowicz (Group 1) (1.1); telephone conference wit EB records database and related correspondence with (all) (.2); exchange correspondence with A. Watychowic claimants and liens (Group 1) (.1); study correspondence production of records from third party (sole lien) (.2); study motion to compel (Group 1) (.1).	is, and A. th J. Wine re claimants' c cz regarding ce regarding	egarding counsel J
			Claims Administration & Objections		
SUBTOTAL:				[50.70	19773.00]
				56.90	\$22,191.00
			Summary of Activity		
Kevin B. Duff			Hours 56.90	Rate 390.00	\$22,191.00

## **SUMMARY**

TOTAL DUE	\$22,191.00
Other Charges	\$0.00
Legal Services	\$22,191.00

# Case: 1:18-cv-05587 Document #: 1251 Filed: 05/16/22 Page 57 of 162 PageID #:65652 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

May 6, 2022

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No. 6621144

Legal Fees for March 2022 \$8,970.00

Expenses Disbursed \$0.00

Due this Invoice \$8,970.00

	Date	<u>Indiv</u>	<u>Hours</u>	Description		
Asset Ar	nalysis & Re	covery	<u>/_</u>			
	3/8/2022	KBD	0.10	Exchange correspondence with A. Watychowicz regard domains.	ing EquityBuild	
				Asset Analysis & Recovery		
	3/10/2022	KBD	0.10	Telephone conference with SEC.		
				Asset Analysis & Recovery		
	3/11/2022	KBD	0.10	Telephone conference with SEC.		
				Asset Analysis & Recovery		
SUBTOT	AL:				[ 0.30	117.00]
Asset Dis	sposition					
	3/7/2022	KBD	0.30	Attention to deposit of funds from title company into sep account (7109 Calumet).	parate property	
				Asset Disposition		
SUBTOT	AL:				[ 0.30	117.00]
Business	s Operations	5				
	3/3/2022	KBD	0.10	Study correspondence from insurance carrier regarding determination and exchange related correspondence w Calumet).		33
				Business Operations		
	3/4/2022	KBD	0.20	Exchange correspondence with insurance broker and termination of property, umbrella, and general liability property (7109 Calumet).		
				Business Operations		
	3/7/2022	KBD	0.20	Exchange further correspondence with E. Duff regarding property, umbrella, and general liability policies following (7109 Calumet) (.1); exchange correspondence with J. court trial planning (7748 Essex) (.1).	ng sale of prope	erty
				Business Operations		
	3/8/2022	KBD	0.10	Confer with M. Rachlis and J. Wine regarding potential personal injury action (7748 Essex).	participation at	trial of

<u>Date</u>	Indiv	Hours	Description
			Business Operations
3/16/202	22 KBD	0.10	Attention to communications with insurance broker regarding recovery of insurance premium refunds (all).
			Business Operations
3/17/202	22 KBD	1.40	Exchange correspondence with J. Wine regarding notice to collection firm regarding claim related to property (5001 Drexel) (.1); telephone conferences with J. Wine regarding state court motion (7748 Essex) (.2); telephone conference with J. Wine and state court counsel regarding motion, response, and communication with plaintiff's counsel (7748 Essex) (.4); study and revise letter to plaintiff's counsel regarding motion for rule to show cause and exchange related correspondence with J. Wine and M. Rachlis (7748 Essex) (.5); exchange correspondence with A. Porter, M. Rachlis, and J. Wine regarding state court action involving former property (defer) (.2).
			Business Operations
3/18/202	22 KBD	0.50	Exchange correspondence with J. Wine regarding plaintiff's motion for rule to show cause, hearing on same, and exchange related correspondence with J. Wine (7748 Essex).
			Business Operations
3/21/202	22 KBD	0.20	Telephone conference with K. Pritchard regarding expense accounting, reimbursement, and allocation (defer) (.1); exchange correspondence with state court counsel regarding trial representative (7748 Essex) (.1).
			Business Operations
3/25/202	22 KBD	0.20	Exchange correspondence with state court counsel regarding assignment of trial judge and settlement of case (4533 Calumet).
			Business Operations
3/31/202	22 KBD	0.10	Attention to state court action involving former property (defer).
			Business Operations
SUBTOTAL:			[ 3.10 1209.00]
Case Administrati	on		
3/3/2022	2 KBD	0.30	Study list of pleadings for receivership website and related telephone conference with A. Watychowicz.

Case Administration

	Date	Indiv	<u>Hours</u>	Description
	3/9/2022	KBD	0.20	Exchange correspondence with J. Wine regarding vendor invoice.
				Case Administration
	3/24/2022	KBD	0.20	Attention to deposits and exchange related correspondence with K. Pritchard.
				Case Administration
SUBTOT	AL:			[ 0.70 273.00]
Claims A	dministratio	n & Ol	ojections	<u>5</u>
	3/1/2022	KBD	0.40	Attention to and revision of communication with claimants regarding position statement opportunity (Group 1) (.3); review correspondence from claimant regarding claims and timing (all) (.1).
				Claims Administration & Objections
	3/3/2022	KBD	0.50	Attention to correspondence with and voice message from claimant regarding claims process (all) (.1); attention to service of and compliance with subpoena and exchange related correspondence with J. Wine (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.1); exchange correspondence with J. Wine and M. Rachlis regarding analysis of claim (Group 1) (.2); study claimants' opposition to motion to compel (Group 1) (.1).
				Claims Administration & Objections
	3/7/2022	KBD	0.50	Work on communication to claimants regarding responsive statements and schedule (Group 1) (.3); exchange correspondence with J. Wine regarding prior hearing before Judge Lee and status of discovery (sole lien) (.1); attention to communication with claimant regarding Group 1 timing and potential disbursement (Group 1) (.1).
				Claims Administration & Objections
	3/8/2022	KBD	0.10	Exchange correspondence with A. Watychowicz regarding correspondence from putative claimant and absence of record of claim (all).
				Claims Administration & Objections
	3/9/2022	KBD	0.30	Exchange correspondence with A. Watychowicz and J. Wine regarding communication with claimant regarding submitted and unsubmitted claims (all).
				Claims Administration & Objections
	3/10/2022	KBD	0.40	Telephone conference with SEC (Group 1) (.2); exchange correspondence with A. Watychowicz regarding communication with claimant regarding claim submission issues (all) (.2).

Date	Indiv	Hours	Description
3/11/2022	KBD	0.60	Confer with M. Rachlis and J. Wine regarding EB records database and claimants' request for database records (all) (.3); telephone conference with SEC (all) (.1); exchange correspondence with A. Porter, M. Rachlis, and J. Wine regarding additional information relating to submission (Group 1) (.2).
			Claims Administration & Objections
3/14/2022	KBD	2.50	Study claimants' and SEC responsive statements and exchange related correspondence with J. Wine (Group 1).
			Claims Administration & Objections
3/15/2022	KBD	0.30	Study correspondence from M. Rachlis and J. Wine regarding claimant response brief (Group 1).
			Claims Administration & Objections
3/21/2022	KBD	2.30	Attention to potential claims setoff issue and exchange related correspondence with J. Wine and A. Watychowicz (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 7109 Calumet; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 7933 Kingston; 8405 Marquette; 8800 Ada; 3723 W 68th; 61 E 92nd; 7953 Woodlawn; 5437 Laflin; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326 Ellis; 11117 Longwood; 6949 Merrill; 7927 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.3); study and revise draft reply to claimant submission on avoidance and study various related filings and correspondence (Group 1) (2.0).
			Claims Administration & Objections
3/22/2022	KBD	0.80	Study draft claims status report and exchange related correspondence with M. Rachlis and J. Wine (Group 1) (.4); study revised draft reply to claimant submission on avoidance (Group 1) (.4).
			Claims Administration & Objections
3/23/2022	KBD	0.90	Telephone conference with SEC regarding draft joint status report (Group 1) (.2); exchange correspondence with M. Rachlis and J. Wine regarding joint

Date	Indiv	Hours	Description
			joint status report and communications with claimants (Group 1) (.2); telephone conference with M. Rachlis regarding draft joint status report, claimant's request for extension, and various issues relating to potential evidentiary hearing (Group 1) (.4); exchange correspondence with A. Watychowicz regarding claimant communication and claim information (all) (.1).
			Claims Administration & Objections
3/24/2022	KBD	1.90	Study and revise avoidance claim reply brief (Group 1) (1.8); review correspondence regarding joint status report (Group 1) (.1).
			Claims Administration & Objections
3/25/2022	KBD	0.90	Telephone conference with SEC regarding draft joint status report (all) (.2); exchange correspondence with M. Rachlis and J. Wine regarding draft joint status report and revise same (all) (.3); study revised avoidance claim reply brief (Group 1) (.4).
			Claims Administration & Objections
3/27/2022	KBD	1.50	Study and revise avoidance reply brief (Group 1).
			Claims Administration & Objections
3/28/2022	KBD	2.80	Study and revise multiple drafts of reply on avoidance issues and exchange various related correspondence with M. Rachlis, J. Wine, and A. Watychowicz (Group 1).
			Claims Administration & Objections
3/29/2022	KBD	1.90	Study various revisions to and correspondence relating to joint status report and potential evidentiary hearing (Group 1).
			Claims Administration & Objections
AL:			

SUBTO 0]

> 23.00 \$8,970.00

Summary of Activity Hours 23.00 Rate 390.00 Kevin B. Duff \$8,970.00

## **SUMMARY**

Legal Services	\$8,970.00
Other Charges	\$0.00
TOTAL DUE	\$8,970.00 

# Exhibit G

# Case: 1:18-cv-05587 Document #: 1251 Filed: 05/16/22 Page 65 of 162 PageID #:65660 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

May 3, 2022

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No. 6622142

Legal Fees for January 2022 \$61,786.00

Expenses Disbursed \$852.49

Due this Invoice \$62,638.49

	<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description
Asset Analysis & Recovery				
	1/6/2022	KMP	0.20	Communicate with K. Duff and J. Wine regarding third-party request for certificate of compliance in connection with subpoena.
				Asset Analysis & Recovery
	1/7/2022	JRW	0.10	Exchange correspondence regarding request from subpoenaed party regarding compliance with Right to Financial Privacy Act.
				Asset Analysis & Recovery
	1/10/2022	JRW	0.10	Telephone conference with third party regarding response to subpoena.
				Asset Analysis & Recovery
	1/11/2022	JRW	0.10	Exchange correspondence with K. Pritchard regarding response to subpoena.
				Asset Analysis & Recovery
		KMP	0.20	Communicate with J. Wine regarding correspondence received from third party requesting certificate of compliance.
				Asset Analysis & Recovery
	1/13/2022	AW	0.50	Correspond with IT vendor and follow up communications with K. Duff and J. Wine regarding EB email account.
				Asset Analysis & Recovery
		JRW	0.10	Confer with K. Pritchard regarding response to subpoena and review document production.
				Asset Analysis & Recovery
		KMP	0.40	Upload third-party document production to network file and briefly review production (.3); communicate with J. Wine regarding contents of third-party document production (.1).
				Asset Analysis & Recovery
	1/18/2022	AEP	0.10	Review subpoenas prepared for service upon accounting firms seeking tax information pertaining to the receivership defendants.
				Asset Analysis & Recovery
		JRW	1.10	Attention to revising and finalizing subpoenas and related communications with A. Porter and K. Pritchard.
				Asset Analysis & Recovery

<u>Date</u>	Indiv	Hours	Description
1/18/2022	KMP	0.20	Communicate with J. Wine regarding issuance of subpoena to third party.
			Asset Analysis & Recovery
1/19/2022	AW	0.50	Conference call with government representatives.
			Asset Analysis & Recovery
	JRW	0.50	Telephone conference with government.
			Asset Analysis & Recovery
	KMP	1.80	Revise, finalize, and prepare transmittals of subpoenas, riders, and notice letters to third parties and related communications with J. Wine.
			Asset Analysis & Recovery
1/20/2022	AW	0.40	Attention to email from domain host, research regarding prior communications and related email to K. Duff.
			Asset Analysis & Recovery
	JRW	0.20	Confer with K. Pritchard regarding tracking of responses to subpoenas and related review of records.
			Asset Analysis & Recovery
	KMP	1.90	Prepare and serve notice of third-party subpoenas and related communications with J. Wine (.4); work on preparation of spreadsheet detailing information relating to and tracking status of third-party subpoenas issued to date, and related communications with J. Wine and A. Watychowicz (1.5).
			Asset Analysis & Recovery
1/21/2022	AW	0.50	Update chain of custody document and related email exchange with K. Duff and J. Wine (.1); prepare materials for production (.2); continue research regarding domain host and related email to K. Duff (.2).
			Asset Analysis & Recovery
	KMP	0.80	Revise and update spreadsheet detailing information relating to and tracking status of third-party subpoenas issued to date, and related communications with J. Wine.
			Asset Analysis & Recovery
1/24/2022	JRW	0.10	Update spreadsheet and confer with K. Pritchard regarding tracking of subpoena responses.
			Asset Analysis & Recovery

<u>Date</u>	Indiv	Hours	Description
1/25/2022	AW	0.10	Communicate with K. Duff regarding transfer of files.
			Asset Analysis & Recovery
	KMP	0.60	Revise spreadsheet tracking responses to third-party discovery and related communications with J. Wine.
			Asset Analysis & Recovery
1/28/2022	JRW	0.10	Telephone conference with third party regarding subpoena.
			Asset Analysis & Recovery
SUBTOTAL:			[10.60 1797.00]
Asset Disposition		_	
1/3/2022	AW	0.40	Correspond with K. Duff, M. Rachlis, and J. Wine regarding fifteenth motion to approve sale, prepare transmittal email, and serve as per motion's service list (7109 Calumet).
			Asset Disposition
	MR	0.10	Attention to issues regarding 15th motion to approve sales (7109 Calumet).
			Asset Disposition
1/10/2022	AW	0.20	Attention to entered order regarding sale motion and related email to counsel (7109 Calumet) (.1); attention to reply in support of motion to designate order as final and related email to counsel (6949 Merrill; 7600 Kingston; 7656 Kingston) (.1).
			Asset Disposition
	JRW	0.10	Review reply memorandum in support of motion to designate order as final judgment (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
	MR	0.30	Attention to reply from intervenor regarding motion to designate interlocutory order as final judgment (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
1/14/2022	KMP	0.20	Review bank records for property relating to post-sale distribution by property manager and related communication with J. Rak (638 Avers).
			Asset Disposition

Date	Indiv	Hours	Description
1/17/2022	JR	0.80	Review email from K. Duff related to single family home allocations, review previous communication with bank, A. Porter and J. Wine and confirm amounts of net wires to K. Duff (single family).
			Asset Disposition
	KMP	0.20	Communicate with K. Duff, J. Wine, and J. Rak regarding confirmation of accuracy of deposits of proceeds for individual single family property accounts (single family).
			Asset Disposition
1/19/2022	JR	0.30	Exchange correspondence with A. Porter relating to a title indemnity holdback and discuss next steps (7748 Essex).
			Asset Disposition
1/21/2022	AEP	0.40	Read, edit, and revise proposed order confirming 15th motion to confirm sale of receivership property (7109 Calumet).
			Asset Disposition
	JRW	0.10	Correspondence with A. Porter and K. Duff regarding proposed order granting 15th sales motion (7109 Calumet).
			Asset Disposition
1/24/2022	AEP	0.20	Teleconference with J. Rak regarding preparation for closing of receivership property (7109 S Calumet) (.1); teleconference with receivership broker regarding preparation for closing of receivership property (7109 S. Calumet) (.1).
			Asset Disposition
	AW	0.10	Attention to order granting 15th motion to confirm sale and related email to counsel (7109 Calumet).
			Asset Disposition
	JR	1.80	Communicate with A. Porter requesting status of closing of property and status of Order being granted for approval of property (7109 Calumet) (.1); update closing checklist with pertinent buyer information in preparation for closing (7109 Calumet) (.6); exchange communication with the purchaser and purchaser's counsel requesting pertinent information required for closing and update closing checklist (7109 Calumet) (.6); communication with property management requesting property management information in preparation for submitting the final water application (7109 Calumet) (.1); submit final water certificate application to the title company for processing (7109 Calumet) (.4).
			Asset Disposition

<u>Date</u>	Indiv	Hours	Description
1/24/2022	JRW	0.40	Review revisions to proposed order and correspondence with Judge Lee's courtroom deputy regarding entry of same (7109 Calumet).
			Asset Disposition
	KMP	0.90	Review property manager's post-sale accounting for property, compile and analyze related invoices and reports, and related communications with K. Duff and J. Rak (638 Avers).
			Asset Disposition
1/25/2022	JR	0.20	Update closing checklist with additional buyer information related to lender for property (7109 Calumet).
			Asset Disposition
1/26/2022	JR	4.30	Prepare closing documents in anticipation for closing (7109 Calumet) (3.8); exchange correspondence with real estate broker requesting commission statement for property (7109 Calumet) (.1); follow up communication with buyer's counsel requesting loan amount and lender information (7109 Calumet) (.1); further communication with the property manager requesting all the financial statements for 2021 for property in an effort to reconcile financials (7109 Calumet) (.3).
			Asset Disposition
SUBTOTAL:			[11.00 1862.00]
Business Operations	3		
1/3/2022	JRW	0.50	Confer with K. Pritchard and telephone conference with E. Duff regarding property reports and insurance allocations for third restoration motion (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis)

**Business Operations** 

JRW 4.00 Review prior restoration motions, prepare list of outstanding invoices, and begin drafting third restoration motion (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis).

**Business Operations** 

<u>Date</u>	<u>Indiv</u> <u>F</u>	<u>Hours</u>	Description
1/3/2022	KMP	0.20	Telephone conference with J. Wine regarding issues relating to third restoration motion (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis).
			Business Operations
1/4/2022	JR	0.10	Follow up communication with insurance broker account analyst requesting property endorsement (4611 Drexel).
			Business Operations
	JRW	0.10	Exchange correspondence with A. Porter and K. Duff regarding unpaid invoice for vendor services (7635 East End).
			Business Operations
	MR	0.10	Attention to issues regarding motion regarding former properties (defer).
			Business Operations
1/5/2022	ED	2.90	Review and analysis of insurance policy endorsements relating to prepaid premium refunds (8047 Manistee; 701 S 5th; 7749 Yates; 1050 8th N (Naples, FL); 6749 Merrill; 7450 Luella; 7546 Saginaw; 8201 Kingston; 4520 Drexel; 8326 Ellis; 8334 Ellis; 8342 Ellis; 8352 Ellis; 5450 Indiana; 6437 Kenwood; 7760 Coles; 8000 Justine; 8107 Ellis; 82116 Ingleside; 8209 Ellis; 11117 Longwood; 7300 St Lawrence; 7110 Cornell; 7957 Marquette; 7051 Bennett; 3074 Cheltenham; 2736 W 64th; 6356 California; 6355 Talman; 5618 MLK; 7201 Constance; 6554 Vernon; 1700 Juneway; 7201 Dorchester; 7508 Essex; 431 E 42nd; 7701 Essex; 7442 Calumet; 816 Marquette; 6949 Merrill; 4533 Calumet; 4315 Michigan; 7600 Kingston; 7656 Kingston; 1131 E 79th; 6250 S Mozart) (2.3); review and analysis of insurance reimbursement and refunds relating to five properties (3074 Cheltenham; 7201 Constance; 7625 East End; 7635 East End; 7750 Muskegon) (.3); confer with K. Duff regarding allocation of expenses and refunds relating to insurance policies to properties based on date of sale (all) (.3).
			Business Operations

Date	Indiv	<u>Hours</u>	Description
1/6/2022	ED	1.30	Develop spreadsheet to assist in analysis and tracking of property and liability insurance refunds regarding sold properties (all).
			Business Operations
	JR	0.80	Follow up correspondence with insurance broker account analyst requesting an update on property endorsement (4611 Drexel) (.1); further communication with E. Duff regarding status of communication with insurance broker (all) (.1); review emails from insurance broker account analyst and update spreadsheet related to property endorsements (all) (.6).
			Business Operations
1/7/2022	ED	0.60	Call with J. Rak to discuss organization and review of remaining insurance premium refund information (all).
			Business Operations
	JR	0.70	Communication with E. Duff regarding status of property insurance endorsements for all properties, a plan of action related to missing information related to property endorsement refunds and updating closing dates for properties, update spreadsheet regarding property endorsements related to same (all).
			Business Operations
1/10/2022	JR	4.00	Update property insurance endorsement spreadsheet with E. Duff notes for all properties, update closing dates (all) (3.9); communication with E. Duff providing updated and completed spreadsheet, inquire about next steps (all) (.1).
			Business Operations
	JRW	2.10	Attention to drafting third restoration motion (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis) (1.2);

#### Date Indiv Hours Description

review records and exchange correspondence with K. Pritchard regarding invoices (1414 East 62nd; 6160 MLK; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7749 Yates; 7834 Ellis; 8201 Kingston) (.7); correspondence from insurer regarding coverage decision and related exchange with K. Duff and M. Rachlis (4533 Calumet) (.2).

#### **Business Operations**

1/10/2022 KMP

0.80 Communications with J. Wine regarding various issues relating to motion for restoration of expenses and related review of emails to revise and update list of issues (1414 East 62nd; 6160 MLK; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7749 Yates; 7834 Ellis; 8201 Kingston).

**Business Operations** 

0.30 Exchanges and follow up regarding coverage issues relating to state court action (4533 Calumet) (.2); follow up on stipulation regarding foreclosure suits (defer) (.1).

**Business Operations** 

1/11/2022 ED

MR

2.40 Further refine insurance cost spreadsheet relating to allocation of premium for sold properties (all) (.9); confer with K. Duff regarding collection and presentation of insurance cost allocation information (all) (.4); prepare summary of insurance cost information relating to sold properties for request to insurance agent (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 1401 W 109th; 310 E 50th; 6807 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 7327 Bennett; 6217 Dorchester; 7255 Euclid) (.4); email correspondence with insurance agent regarding production of missing endorsements and cost information (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 1401 W 109th; 310 E 50th; 6807 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 7327 Bennett; 6217 Dorchester; 7255 Euclid) (.7).

Date Indiv Hours Description

1/11/2022 JR

1.70 Exchange communication with E. Duff related to updated property insurance endorsements and refunds (all) (.2); review emails from insurance broker account analyst and further update master insurance refunds analysis spreadsheet (all) (1.3); exchange communication with K. Pritchard regarding reimbursement for water to A. Porter from sale of property related to the restoration motion (417 Oglesby) (.2).

**Business Operations** 

JRW 2.50 Attention to drafting third restoration motion and related analysis of materials, preparation of spreadsheet, and communications with K. Pritchard and E. Duff (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis) (2.4); correspondence to plaintiff's counsel regarding stay of litigation matter relating to property (4533 Calumet) (.1).

**Business Operations** 

KMP 3.50 Further review of emails and financial documents to revise and update list of issues relating to motion for restoration of expenses and several related communications with K. Duff and J. Wine (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis) (3.2); review email correspondence regarding insurance provisions and related communication with K. Duff (all) (.3).

JR

1/12/2022 ED 0.30 Call with J. Wine to discuss process for allocation of insurance refunds to sold properties and calculation of amounts reimbursable to Receivership (all).

**Business Operations** 

1.90 Review emails from insurance broker account and further update master insurance refunds analysis spreadsheet (all) (1.7); review email from property management related to certificate of insurance, further communication with E. Duff and insurance firm inquiring about certificate of insurance for property (7109 Calumet) (.2).

**Business Operations** 

JRW 1.60 Confer with K. Duff and work with K. Pritchard regarding expenses and payments subject to expense restoration motion (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis) (1.2); correspondence to property manager regarding invoice (8326 Ellis) (.2); correspondence with defense counsel in state court litigation regarding property inspection and related exchange with J. Rak (7748 Essex) (.2).

**Business Operations** 

JRW 1.20 Telephone conference with E. Duff regarding accountant work related to property expenses, and continue drafting expense restoration motion (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis).

<u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

1/12/2022 KMP

0.20 Further communications with J. Wine regarding additional issues relating to motion for expense restoration (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis).

**Business Operations** 

1/13/2022 ED

2.90 Call with K. Duff and insurance agent regarding process for obtaining and verifying final information regarding property insurance refunds for prepaid premium with respect to sold properties (all) (.3); conference with K. Duff regarding finalizing allocation of insurance and other receivership expenditures by property (all) (.3); further analysis of premium refund information relating to sold properties (all) (1.1); email correspondence to accountant regarding process and timing for finalizing Receiver's property reports for all properties (all) (.3); calls with J. Rak to discuss review of financial reporting for periods beginning 10/1/2020 for purposes of preparation of Receiver's property reports (all) (.4); conference call with accountants to discuss preparation of additional Receiver's property reports (all) (.4); review of property manager reporting for use in generating 2021 Receiver's Property Reports (9610 Woodlawn; 1401 W 109th; 310 E 50th; 6807 Indiana; 7255 Euclid; 7237 Bennett; 638 Avers; 7109 Calumet) (.1).

**Business Operations** 

ED 0.80 Review of property manager reporting for use in generating 2021 Receiver's property reports (4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 1422 E 68th; 6217 Dorchester) (.5); send financial reporting documents to accountant to use in generating 2021 Receiver's property reports (4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 1422 E 68th; 6217 Dorchester) (.3).

Date Indiv Hours Description

1/13/2022 ED

0.20 Email correspondence with K. Pritchard and accountants regarding Receivership receipts and expenditures during 2021 relating to properties (4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester; 1102 Bingham; 638 Avers; 7109 Calumet).

**Business Operations** 

4.70 Review emails from insurance broker account analyst, review property insurance endorsements and further update master insurance refunds analysis spreadsheet (all) (2.1); telephone communication with E. Duff related to status of financial property reporting for 2020 through 2021 (all) (.2); review emails and related information to financial statements for all properties in preparation for review (all) (.5); further communication with E. Duff regarding status of financial reports review and property insurance refunds (all) (.3); review and consolidate property account statements for December (all) (1.6).

**Business Operations** 

JRW 0.60 Correspondence with counsel in state court litigation and property manager regarding inspection of property (7748 Essex) (.1); correspondence with claimants' counsel, review revised stipulation and order, and confer with M. Rachlis regarding execution of same (defer) (.4); exchange correspondence with Judge's courtroom deputy regarding entry of proposed order (defer) (.1).

**Business Operations** 

KMP 0.50 Review and revise stipulation relating to motion to intervene, and related communications with J. Wine (defer) (.3); communications with E. Duff regarding her request for account ledgers identifying property expenses in connection with motion for restoration (4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester; 1102 Bingham; 638 Avers; 7109 Calumet).

Date Indiv Hours Description 1/13/2022 MR 0.20 Attention to petition to intervene and stipulation and follow up with J. Wine regarding same (defer). **Business Operations** 1/14/2022 JR 4.10 Review emails from E. Duff containing all financial property reports from property management and generate and organize all financial reports for January through December of 2021 in preparation for review (7448 S Calumet; 7701 S Essex; 816 Marquette; 1131 E 79th; 1414 E 62nd; 4533 Calumet; 4611 Drexel; 6217 Dorchester; 6951 Merrill; 7024 Paxton; 7749 Yates; 8047 Manistee; 8201 Kingston; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 S Kingston; 7933 Kingston; 8030 Marguette; 8104 Kingston; 8403 Aberdeen; 8405 Marguette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 S Laflin; 6759 S Indiana) (3.9); review certificate of insurance for property and file in electronic files (7109 S Calumet) (.1); communication with K. Pritchard requesting update relating to post-closing reconciliation balance regarding sold property (638 Avers) (.1). **Business Operations** MR 0.20 Attention to stipulation issues relating to petition to intervene and follow up on same (defer). **Business Operations** 1/17/2022 JR 0.40 Review email from K. Pritchard related to monthly schedule of accounts for January through December of 2021, produce all statements and organize in files in preparation for review (7448 S Calumet; 7701 S Essex; 816 Marquette; 1131 E 79th; 1414 E 62nd; 4533 Calumet; 4611 Drexel; 6217 Dorchester; 6951 Merrill; 7024 Paxton; 7749 Yates; 8047 Manistee; 8201 Kingston; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 S Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 S Laflin; 6759 S Indiana).

1/19/2022 JR

1/18/2022 AW 0.20 Correspond with E. Duff regarding reporting from management company (7109 Calumet).

**Business Operations** 

JRW 0.10 Correspondence with K. Pritchard regarding funds paid to property managers (1401 W 109th; 1414 E 62nd; 2736 W 64th; 416 E 66th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6250 Mozart; 6356 California; 6357 Talman; 638 Avers; 6751 Merrill; 7051 Bennett; 7201 Constance; 7201 Dorchester; 7237 Bennett; 7600 Kingston; 7760 Coles; 7957 Marquette; 8000 Justine; 8209 Ellis; 8214 Ingleside; 8326 Ellis; 8334 Ellis; 8352 Ellis; single family).

**Business Operations** 

KMP 1.30 Communicate with J. Wine regarding preparation of spreadsheet for restoration motion detailing expenses paid to property managers from receivership accounts and begin work on spreadsheet (1401 W 109th; 1414 E 62nd; 2736 W 64th; 416 E 66th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6250 Mozart; 6356 California; 6357 Talman; 638 Avers; 6751 Merrill; 7051 Bennett; 7201 Constance; 7201 Dorchester; 7237 Bennett; 7600 Kingston; 7760 Coles; 7957 Marquette; 8000 Justine; 8209 Ellis; 8214 Ingleside; 8326 Ellis; 8334 Ellis; 8352 Ellis; single family).

**Business Operations** 

0.10 Review email from E. Duff regarding financial reports for September and October 2021 in preparation for review, save in electronic files and forward to accounting firm (all).

**KMP** 

1/19/2022 JRW 0.20 Confer with M. Rachlis regarding coverage decision (4533 Calumet).

**Business Operations** 

4.40 Continue work on spreadsheet for third restoration motion detailing expenses paid to property managers from receivership accounts and related communication with J. Wine (1401 W 109th; 1414 E 62nd; 2736 W 64th; 416 E 66th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6250 Mozart; 6356 California; 6357 Talman; 638 Avers; 6751 Merrill; 7051 Bennett; 7201 Constance; 7201 Dorchester; 7237 Bennett; 7600 Kingston; 7760 Coles; 7957 Marquette; 8000 Justine; 8209 Ellis; 8214 Ingleside; 8326 Ellis; 8334 Ellis; 8352 Ellis; single family).

**Business Operations** 

MR 0.10 Follow up with J. Wine regarding coverage issues relating to state court action (4533 Calumet).

**Business Operations** 

1/20/2022 AW 0.10 Attention to order regarding scheduled case management conference and related docket entry (4533 Calumet).

**Business Operations** 

JRW 1.20 Telephone conference with plaintiff's counsel regarding stay of proceedings (4533 Calumet) (.2); telephone conference with clerk for Judge O'Malley regarding covid procedures (4533 Calumet) (.1); correspondence with M. Rachlis and K. Duff regarding state court action and related review of Order Appointing Receiver (4533 Calumet) (.7); correspondence to property manager and insurance adjuster regarding coverage determination (4533 Calumet) (.2).

**Business Operations** 

KMP 1.90 Continue work on spreadsheet for third restoration motion detailing expenses paid to property managers from receivership accounts and related communication with J. Wine (1401 W 109th; 1414 E 62nd; 2736 W 64th; 416 E 66th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6250 Mozart; 6356 California; 6357 Talman; 638 Avers; 6751 Merrill; 7051 Bennett; 7201 Constance; 7201 Dorchester; 7237 Bennett; 7600 Kingston; 7760 Coles; 7957 Marquette; 8000 Justine; 8209 Ellis; 8214 Ingleside; 8326 Ellis; 8334 Ellis; 8352 Ellis; single family).

Date	Indiv	Hours	Description
1/20/2022	2022 MR 0.50		Attention to issues regarding insurance relating to state court action, and related review of emails and agreement (4533 Calumet).
			Business Operations
1/21/2022	AEP	0.20	Search e-mails of EquityBuild principals for records relating to litigation issue and transmit copy to K. Duff (4533 S Calumet).
			Business Operations
	AW	0.10	Attention to correspondence regarding entity franchise tax and related correspondence with K. Duff (defer).
			Business Operations
	ED	0.90	Telephone call with J. Rak regarding summary of insurance endorsements received to date relating to sold properties (all) (.1); review and revise spreadsheet prepared by J. Rak to identify properties with respect to which policy endorsements have not yet been received (all) (.6); mail correspondence to insurance agent transmitting spreadsheet relating to endorsements for termination of policies and requesting missing endorsements and other information (all) (.2).
			Business Operations
	JR	1.10	Communication with E. Duff regarding status of property insurance endorsements and refunds, update and forward insurance analysis worksheet (all).
			Business Operations
	JRW	0.10	Correspondence with property manager regarding outstanding invoice (8326 Ellis).
			Business Operations

<u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

1/22/2022 JR 0.10 Review email from K. Duff requesting to send update property insurance firm upon closing of property (7109 Calumet).

**Business Operations** 

1/24/2022 JR

0.70 Review email from K. Duff requesting status of closing statements reconciliation report from the sale of properties, review, update and provide same (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 S MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California: 7051 Bennett: 7201 Dorchester: 7442 Calumet: 7508 Essex: 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette: 816 Marquette: 8201 Kingston: 8326-58 Ellis: 11117 Longwood: 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.2); follow up communication with property management requesting status of post-closing reconciliation for closed property and request status of property financials including water bill refund, further related communication with K. Duff and K. Pritchard regarding status (638 Avers) (.5).

**Business Operations** 

JR 0.90 Review communication from E. Duff and insurance broker account analyst regarding missing property endorsements and review additional information in an attempt to find missing endorsements (all).

**Business Operations** 

JRW 0.50 Review EB records for litigation issue and related summary to K. Duff and M. Rachlis (4533 Calumet) (.2); review analysis of state court action from M. Rachlis (4533 Calumet) (.1); confer with K. Duff regarding upcoming hearing and exchange correspondence with plaintiff's counsel (4533 Calumet) (.2).

**Business Operations** 

KMP 0.50 Review various financial reports and communications with K. Duff and J. Rak regarding issues relating to property manager's accounting for remaining unsold property (7109 Calumet).

Date	Indiv	Hours	Description
1/24/2022	MR	0.30	Attention to insurance coverage issues relating to state court action (4533 Calumet).
			Business Operations
1/25/2022	JR	4.00	Review email from K. Duff requesting a review of financial reports related to management audit fees (7109 Calumet) (1.8); forward property financial reports to E. Duff for further review (7109 Calumet) (.1); request property management to provide financial property reports at the time of the property management transfer (7109 Calumet) (.2); communication with K. Duff and K. Pritchard related to property financial reports (7109 Calumet) (.2); analyze email communication with insurance broker, reconcile missing and duplicate insurance endorsements (all) (1.7).
			Business Operations
	JRW	1.00	Attend state court hearing regarding status of litigation matter and related update to team (4533 Calumet) (.8); conference with K. Duff and M. Rachlis regarding state court hearing (4533 Calumet) (.2).
			Business Operations
	KMP	0.10	Further communications with J. Rak regarding issues relating to property manager's accounting for remaining unsold property (7109 Calumet).
			Business Operations
	MR	0.20	Confer with K. Duff and J. Wine regarding state court action (4533 Calumet).
			Business Operations
1/26/2022	JR	2.30	Update insurance analysis spreadsheet, update, rename electronic files and communicate with E. Duff regarding same (all).
			Business Operations
1/27/2022	ED	2.60	Review questions from accountant relating to property manager reporting (310 E 50th; 1401 W 109th; 6807 Indiana) (.3); review questions from accountant relating to property manager reporting (6250 Mozart) (.3); review questions from accountant relating to property manager reporting (7051 Bennett) (.3); review questions from accountant relating to property manager reporting (7508 Essex) (.3); review questions from accountant relating to property manager reporting (7109 Calumet) (.1); email correspondence to property manager to follow up on final reporting for two sold properties (7051 Bennett; 7508 Essex) (.2); review and analysis of documents and email correspondence received from insurance agent relating to cancellation of policies with respect to sold properties and calculation of related refunds (all) (.7); email correspondence and telephone conference with J. Rak regarding necessary further review of insurance policy termination and refund documentation (all) (.4).
			Business Operations

1/27/2022 ED

0.90 Draft list of follow-up items needed from insurance agent and carrier regarding policy cancellations and refunds (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marguette; 8104 Kingston; 8403 Aberdeen; 8405 Marguette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 1401 W 109th; 310 E 50th; 6807 Indiana) (.4); review and analysis of loan history documents submitted in connection with claims (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marguette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside) (.5).

**Business Operations** 

JR 0.30 Exchange correspondence with E. Duff regarding further consolidation of property insurance endorsements (defer).

**Business Operations** 

JRW 0.20 Exchange correspondence with S. Zjalic regarding municipal code violation notice and review same (8209 S Ellis).

**Business Operations** 

1/28/2022 ED

0.30 Email correspondence to insurance agent requesting additional documentation relating to insurance refunds for sold properties (5001 Drexel; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 1401 W 109th; 310 E 50th; 6807 Indiana; 7327 Bennett; 6217 Dorchester; 7255 Euclid).

**Business Operations** 

JR
1.90 Review emails from E. Duff and produce financial property reports related to review of all sold properties in 2021 (4750 Indiana; 7024 Paxton; 7840 Yates; 2800E 81st; 4611 Drexel; 1422 East 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester; 1102 Bingham; 638 Avers; single family) (.5); review electronic files and property endorsements related to property insurance refunds (all)

Date	Indiv	Hours	Description
			(.8); review email from accounting firm requesting property financial statements and produce same in anticipation for monthly review for 2021 (7109 Calumet) (.2); review property statements for year 2021 and further communicate with property management requesting missing property and income financial statements (7109 Calumet) (.4).
			Business Operations
1/28/2022	KMP	0.20	Attention to communications with property manager regarding reconciliation of monthly owners' statements and details of turnover of management duties from other property manager (7109 Calumet).
			Business Operations
1/30/2022	JR	0.50	Review property insurance endorsement and refunds in anticipation for final production to E. Duff (all).
			Business Operations
1/31/2022	AW	0.20	Research regarding insurance claim and related email exchange (1700 Juneway).
			Business Operations
	ED	0.70	Email correspondence with J. Rak and insurance agent regarding additional information required for calculation of refunds of prepaid premium amounts (5001 Drexel; 7051 Bennett; 701 S 5th; 2800 E 81st; 4611 Drexel; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 86th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8342 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana).
			Business Operations
	JR	3.30	Extensive review and update of property insurance endorsements and refunds of properties (all) (2.9); exchange correspondence with E. Duff regarding property insurance endorsements and provide requested information (4533 Calumet) (.4).
			Business Operations
	JRW	0.80	Review correspondence from insurance company regarding deductibles and related review of documents and communications with K. Duff and K. Pritchard (7748 Essex; 1700 Juneway) (.4); telephone conference with insurance defense counsel and related update to K. Duff (7748 Essex) (.4).
			Business Operations
	KMP	0.70	Briefly review and forward notices to K. Duff and J. Wine from insurer regarding deductibles for insurance claims against EB properties (7748 Essex; 1700 Juneway) (.2); review court docket regarding insurance

	<u>Date</u>	Indiv	<u>Hours</u>	Description		
				claim against EB property, download case-related docucommunications with J. Wine and A. Watychowicz (170		
				Business Operations		
SUBTO	Γ <b>Δ</b> Ι ·				 [84.10	18503.00]
	ministration				[00	10000.00]
	1/10/2022	AW	1.10	Prepare pleadings for upload to website and related envendor.	nail exchange	with IT
				Case Administration		
		JR	0.80	Download account statements related to properties from and save in electronic files.	n online bank	king portal
				Case Administration		
	1/11/2022	AW	0.10	Attention to information regarding EB email accounts a Wine.	nd related en	nail to J.
				Case Administration		
		JR	1.90	Download property statements from bank portal for Deproperty folders.	cember and s	save in
				Case Administration		
	1/12/2022	JR	0.20	Exchange communication with A. Watychowicz related opposition to motion for clarification of November 18, 2 file opposition.		
				Case Administration		
	1/13/2022	JRW	0.40	Correspondence with A. Watychowicz, K. Duff, and M. document management and related telephone conference.		
				Case Administration		
		MR	0.20	Attention to production issues and follow up from J. Wir	ne.	
				Case Administration		
	1/14/2022	AW	0.90	Email exchanges with K. Duff and calls with J. Rak and email account.	K. Duff rega	rding EB
				Case Administration		
		JR	1.20	Communication with A. Watychowicz relating to EB rec storage devices (.5); confer with K. Duff and A. Watych records issues (.6); exchange communication with J. V up conference call regarding potential issue relating to	nowicz regard Vine requestii	ding EB ng to set
				Case Administration		

Date	Indiv	Hours	Description
1/14/2022	JRW	0.20	Review correspondence, telephone conference with K. Duff, and email to vendor regarding document database.
			Case Administration
1/15/2022	AW	0.50	Work with K. Duff on upload of documents to vendor FTP site.
			Case Administration
1/17/2022	AW	0.20	Communicate with K. Duff and J. Wine regarding issue with EB email file.
			Case Administration
	JR	1.20	Create a spreadsheet containing all the contents of external hard drives related to Equitybuild.
			Case Administration
1/18/2022	JRW	0.60	Correspondence with vendor regarding database content, review accumulated correspondence and related telephone conferences with K. Duff and vendors.
			Case Administration
1/19/2022	AW	0.10	Attention to order with call-in information, related email to counsel, and update docket (Group 1).
			Case Administration
	JRW	0.50	Telephone conference with claimants' counsel regarding class action and related review of claimant contact records and correspondence with K. Duff and telephone conference with A. Watychowicz.
			Case Administration
1/20/2022	AW	0.20	Attention to orders with hearing time change and regarding discovery, related email to counsel, and update docket (Group 1).
			Case Administration
1/24/2022	AW	0.10	Attention to entered order regarding discovery and update docket (Group 1).
			Case Administration

<u></u>	<u>Date</u>	Indiv	<u>Hours</u>	Description		
1	1/24/2022	JRW		Confer with K. Duff and M. Rachlis regarding request for claimant information for class action and related correspondence with plaintiff's counsel.		
				Case Administration		
1	1/25/2022	AW	0.10	Attention to joint status report, related email to counsel, and update docket (Group 1).		
				Case Administration		
1	1/27/2022	AW	0.40	Attention to entered orders providing dial-in info for public and order striking same hearing and joint status report, related correspondence with counsel, and docket update (Group 1) (.2); compile pleadings requested by M. Rachlis and related email exchange (.1); request upload of order striking hearing to website (Group 1) (.1).		
				Case Administration		
1	1/28/2022	AW	0.10	Attention to order scheduling hearing and update docket.		
				Case Administration		
1	1/31/2022	JRW	0.20	Confer with K. Duff, M. Rachlis and database vendor regarding claimants' access to database.		
				Case Administration		
SUBTOTA	۸L:			[11.40 1898.00]		

#### Claims Administration & Objections

1/3/2022 AW

1.70 Attention to emails from claimants in response to update regarding database and related email to K. Duff and J. Wine (all) (.1); research claims and respond to emails responding to update regarding database (all) (.4); email exchanges regarding revisions to position statement template, approval of counsel, and serve on claimants (Group 1) (.6); email exchanges regarding productions of documents by title companies, review and organize productions and related email to J. Wine (sole lien) (.5); attention to motion for clarification and related email with counsel (sole lien) (.1).

Claims Administration & Objections

JRW 1.70 Confer with A. Watychowicz regarding avoidance disclosure (Group 1) (.1); correspondence with claimants' counsel regarding deposition exhibits (Group 1) (.1); review productions pursuant to subpoena and related correspondence and correspondence to claimants counsel regarding same (sole lien) (.4); revise position statement template and related correspondence to Group 1 claimants and related correspondence with K. Duff, M. Rachlis and SEC (Group 1) (.8); review motion for clarification and related correspondence regarding response to same (sole lien) (.3).

<u>Date</u>	Indiv	<u>Hours</u>	Description
1/3/2022	MR	0.30	Attention to template for claimants' position statements and related issues (Group 1).
			Claims Administration & Objections
1/4/2022	AW	1.30	Attention to numerous emails regarding position statement, revisions to follow up email to claimants regarding position statement and related email (Group 1) (.6); email exchange regarding claimant's inquiry, attention to draft response, and related email to claimant (all) (.2); prepare link containing documents produced pursuant to issued subpoenas and related email to counsel (sole lien) (.3); attention to order regarding rebuttal experts and related email to K. Duff and M. Rachlis (Group 1) (.1); attention to motion to clarify and related email to counsel (sole lien) (.1).
			Claims Administration & Objections
	JRW	4.30	Attention to claimant inquiries regarding position statement and related correspondence with team and telephone conference with SEC (Group 1) (.3); draft correspondence to Group 1 claimants regarding position statement and related correspondence regarding revisions to same (Group 1) (.4); correspondence with claimants' counsel, SEC, and K. Duff regarding Judge Kim's order regarding rebuttal expert (Group 1) (.1); attention to claimant inquiry (all) (.1); confer with team regarding correspondence to courtroom deputy regarding motion to intervene, research claims records, draft response to courtroom deputy, and related telephone conference with counsel for investor-lenders (defer) (.6); draft response to motion for clarification of order and related review of transcript and prior briefing (sole lien) (2.8).
			Claims Administration & Objections
	MR	0.40	Attention to communications regarding position statement and other orders (Group 1).
			Claims Administration & Objections
1/5/2022	AW	0.30	Attention to emails from claimants forwarding position statements and related email exchange with K. Duff and J. Wine (Group 1) (.2); communicate with J. Wine regarding receiver's disclosure (Group 1) (.1).
			Claims Administration & Objections
	JRW	1.90	Review claimants' position statement (Group 1) (.1); correspondence with claimants' counsel regarding claimant's discovery responses and review same (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.2); correspondence with team regarding procedure for responding to, serving and filing claimant position statements (Group 1) (.1); review

<u>Date</u>	Indiv	Hours	Description
			court's order regarding rebuttal expert and related communications with K. Duff (Group 1) (.1); correspondence with claimants' counsel, SEC and Judge Kim's clerk regarding court's order regarding expert discovery (Group 1) (.3); review expert deposition transcript and prepare notes regarding same (Group 1) (1.1).
			Claims Administration & Objections
1/5/2022	MR	0.10	Attention to status on expert issues and attention to order and emails regarding same (Group 1).
			Claims Administration & Objections
1/6/2022	JRW	4.40	Confer with K. Duff and M. Rachlis regarding avoidance disclosure (Group 1) (.1); continued review of expert deposition and expert report (Group 1) (2.4); additional legal research and review and revise draft disclosure (Group 1) (1.6); exchange correspondence with K. Pritchard regarding revisions to disclosure and preparation for filing same (Group 1) (.2); attention to claimant inquiry (all) (.1).
			Claims Administration & Objections
	KMP	0.40	Review draft avoidance disclosure and related communications with J. Wine (Group 1).
			Claims Administration & Objections
	MR	2.50	Attention to draft disclosure and review related deposition excerpts and materials (Group 1).
			Claims Administration & Objections
1/7/2022	JRW	3.90	Review redlines, review and update citations, and further revise disclosure statement (Group 1) (3.3); confer with K. Pritchard regarding certificate of service (Group 1) (.2); continued review of expert reports and notes from expert deposition (Group 1) (.4).
			Claims Administration & Objections
	KMP	1.10	Revise, finalize, and file avoidance disclosure and related communications with J. Wine (Group 1).
			Claims Administration & Objections
	MR	2.00	Review and comment on disclosures and follow up on same (Group 1).
			Claims Administration & Objections
1/10/2022	AW	2.30	Attention to claimant email request for position statement and related email response (Group 1) (.1); attention to emails from claimants regarding claims process, properties sale, and requests for claims documentation (all) (1.3); email exchanges regarding communication with claimants and email claimants hearing information and Receiver's disclosure (all) (.6); attention to email with request to update mailing address and related email (all) (.2);

<u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

attention to joint status report regarding rebuttal expert and related email to counsel (Group 1) (.1).

Claims Administration & Objections

1/10/2022 JRW

0.50 Exchange correspondence with claimants' counsel regarding status report on expert discovery and review and comment on draft of same (Group 1) (.1); exchange correspondence with counsel for claimants and M. Rachlis regarding stipulation on motion for leave to file state court action (defer) (.2); correspondence from counsel for government agency and A. Porter regarding lien against properties (1131 E 79th; 7024 Paxton) (.1); review discovery responses and related correspondence to K. Duff and M. Rachlis (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.1).

Claims Administration & Objections

MR 0.90 Review and work on draft response to motion to clarify (sole lien).

Claims Administration & Objections

1/11/2022 AW

2.30 Attention to emails regarding scheduled hearing, requests for claims documentation, and claims process questions (all) (.8); attention to received position statements and related communication with J. Wine (Group 1) (.7); attention to marked deposition exhibits and update records (Group 1) (.3); attention to response to motion to clarify and email counsel proposed revisions (sole lien) (.5).

Claims Administration & Objections

JRW

1.10 Review revisions, comment and further revise response to motion for clarification (sole lien) (1.0); review claimants' position statements and related correspondence with A. Watychowicz (Group 1) (.1).

Claims Administration & Objections

MR 0.30 Further attention to draft response on motion to clarify (sole lien).

Claims Administration & Objections

1/12/2022 AW

0.30 Communicate with J. Wine regarding response to motion for clarification (sole lien) (.1); finalize response to motion for clarification and related email to K. Duff (sole lien) (.2).

Claims Administration & Objections

JRW

1.00 Review position statements (Group 1) (.2); review claims against property and related analysis to K. Duff (7024 S Paxton) (.3); attention to finalizing and filing response to motion for clarification (sole lien) (.3); telephone conference and correspondence with claimants' counsel regarding proposed order (defer) (.2).

Date	Indiv	Hours	Description
1/12/2022	MR	0.40	Further review and follow up on response to motion to clarify and emails regarding same (sole lien).
			Claims Administration & Objections
1/13/2022	AW	0.10	Respond to claimant regarding submission (Group 1).
			Claims Administration & Objections
1/14/2022	AW	0.20	Communicate with claimant regarding update to contact information (Group 1) (.1); attention to claimant's motion regarding additional discovery and update docket (Group 1) (.1).
			Claims Administration & Objections
	MR	0.40	Attention to motion for additional discovery on Group 1 (Group 1) (.3); attention to issues on EB documents database (all) (.1).
			Claims Administration & Objections
1/15/2022	AEP	0.30	Prepare e-mail to claimants' counsel regarding expert discovery issue and potential discovery (Group 1).
			Claims Administration & Objections
1/17/2022	AW	2.00	Attention to numerous position statements from claimants (Group 1) (1.2); review contact sheet and update emailing information per claimant's request (all) (.2); communicate with claimant's counsel regarding access to claims files (all) (.1); response to claimant's inquiry regarding sold property (8100 Essex) (.1); email exchange with claimant regarding position statement template (Group 1) (.1); attention to inquiry regarding claims process and timing and related email response (all) (.1); call and email exchange with K. Pritchard regarding possible claim (all) (.2).
			Claims Administration & Objections
	MR	0.20	Attention to emails and discovery related issues (Group 1).
			Claims Administration & Objections
1/18/2022	AEP	0.40	Read motion for leave to take additional discovery filed by claimant in connection with Claims Group 1 and prepare for related discussion (Group 1).
			Claims Administration & Objections

<u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

1/18/2022 AW

1.30 Research regarding counsel involved in closings (7500 Eggleston; 7549 Essex; 8100 Essex; 6160 MLK; 7927 Essex; 7933 Essex; 7937 Essex; 7943 Essex; 7947 Essex; 5001 Drexel; 7301 Stewart; 7834 Ellis; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 3030 E 79th; 2909 E 78th; 7748 Essex; 8047 Manistee; 701 S 5th; 7749 Yates; 6749 Merrill; 7450 Luella; 7546 Saginaw; 8201 Kingston; 4520 Drexel; 8326 Ellis; 8334 Ellis; 8342 Ellis; 8352 Ellis; 5450 Indiana; 6437 Kenwood; 7760 Coles; 8000 Justine; 8107 Ellis; 8214 Ingleside; 8209 Ellis; 11117 Longwood; 7300 St Lawrence; 7110 Cornell; 7957 Marquette; 7051 Bennett; 2736 W 64th; 6356 California; 6355 Talman; 5618 MLK; 6554 Vernon; 1700 W Juneway; 7201 Dorchester; 7508 Essex; 431 E 42nd; 7701 Essex; 7442 Calumet; 816 E Marquette; 6949 Merrill; 4533 Calumet; 4315 Michigan; 7600 Kingston; 7656 Kingston: 1131 E 79th; 6250 Mozart; 4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester: 1102 Bingham: 638 N Avers: 7109 Calumet) (.9): attention to email from vendor regarding EB emails, research files from vendor, and related email to K. Duff and J. Wine (all) (.4).

Claims Administration & Objections

JRW 1.30 Confer with K. Duff regarding motion for discovery (Group 1) (.1); study motion for discovery and prepare notes regarding same (Group 1) (.8); review production documents regarding account statements (Group 1) (.4).

Claims Administration & Objections

MR 0.40 Review and attention to motion for discovery (Group 1).

Claims Administration & Objections

1/19/2022 AEP

1.80 Teleconference with K. Duff, M. Rachlis, and J. Wine regarding discovery issues, use of proceeds of refinance, and related matters (Group 1).

Claims Administration & Objections

AW 3.70 Call with J. Wine regarding position statements, redactions, and upcoming filing (Group 1) (.2); call with J. Wine regarding claimants' full contact list (all) (.3); complete research regarding counsel involved in closings (all except Group 1) (.7); attention to email from claimants and related email to K. Duff and J. Wine (Group 1) (.1); work on redactions to position statements court filing (Group 1) (2.4).

Claims Administration & Objections

JRW 2.80 Correspondence with SEC and claimants' counsel regarding discovery sought by claimant (Group 1) (.1); extended conference with K. Duff, A. Porter and M. Rachlis regarding response to discovery motion,

Date	Indiv	Hours	Description
	-	-	
			proporation for

preparation for hearing, and evidence supporting claim (Group 1) (1.8); telephone conference with A. Watychowicz regarding position statements, redactions, and upcoming filing (Group 1) (.2); review hearing transcripts in preparation for hearing on discovery motion and related correspondence with M. Rachlis (Group 1) (.5); correspondence to A. Porter regarding documents produced pursuant to subpoena (all) (.2).

Claims Administration & Objections

1/19/2022 MR

2.50 Review motion and attention to various issues on motion for discovery and to prepare for hearing (Group 1) (1.5); conferences regarding motion for discovery with J. Wine, K. Duff and A. Porter (Group 1) (1.0).

Claims Administration & Objections

1/20/2022 AW

0.80 Complete redactions of received position statements for court filings and related email to J. Wine (Group 1) (.6); draft response to claimants (Group 1) (.2).

Claims Administration & Objections

JRW 1.20 Analysis of evidence relating to avoidance claim and related correspondence with M. Rachlis and K. Duff (Group 1) (.4); appear telephonically in court on claimant's motion for discovery (Group 1) (.4); telephone conference with claimants' counsel regarding document production (Group 1) (.1); review and revise proposed order and related correspondence with K. Duff, M. Rachlis and claimants' counsel (Group 1)

(.3).

Claims Administration & Objections

MR 2.40 Prepare for and participate in hearing on discovery (Group 1) (1.7); conference with K. Duff (Group 1) (.4); attention to various issues on draft order (Group 1) (.3).

Claims Administration & Objections

1/21/2022 AW

0.40 Correspond with J. Wine regarding claimants' position statements (Group 1) (.1); communicate with J. Wine regarding bank statement, research regarding same, and related email to J. Wine (Group 1) (.3).

Claims Administration & Objections

JRW 0.80 Confer with M. Rachlis regarding claimant inquiry and position statements (Group 1) (.2); confer with A. Watychowicz regarding position statements (.2); confer with A. Watychowicz and A. Porter regarding bank statements and related searches for same (Group 1) (.2); correspondence to claimants' counsel regarding document production (Group 1) (.1); review contention discovery requests (Group 1) (.1).

Claims Administration & Objections

MR 0.60 Attention to various issues on position statements and discovery issues (Group 1) (.4); conferences regarding various issues on position statements and discovery issues with J. Wine (Group 1) (.2).

**JRW** 

1/24/2022 AW

0.80 Email exchanges with claimant regarding service of position statements, email service, and status on sold properties (Group 1) (.3); draft response to claimants regarding representation by counsel and position statement and related email to claimant (Group 1) (.2); attention to document production from a third party and related communications with J. Wine and K. Pritchard (sole lien) (.3).

Claims Administration & Objections

5.20 Confer with A. Watychowicz regarding document production (sole lien) (.1); attention to claimant inquiries (all) (.3); correspondence with SEC, claimants' counsel and EB team regarding status report and related review of hearing transcript (Group 1) (.3); review and revise draft status report (Group 1) (.2); confer with A. Watychowicz regarding plan for filing of claimants' position statements (Group 1) (.1); attention to review of claim submissions and subpoena responses and related analysis to K. Duff and M. Rachlis (sole lien) (4.2).

Claims Administration & Objections

MR 1.00 Attention to claims status report related issues (Group 1) (.2); attention to discovery issues and review of claims (sole lien) (.3); attention to request for claim information and related conference (defer) (.5).

Claims Administration & Objections

1/25/2022 AW

0.20 Exchange correspondence with claimant regarding his duplicative submission (Group 1) (.1); draft response to claimant inquiring about claims process length and proceeds from sales and related email response (8100 Essex) (.1).

Claims Administration & Objections

JR 1.40 Communication with J. Wine requesting an update on claims spreadsheet related to sole claims for various properties and update same (2136 W 83rd; 7922 Luella; 7925 Kingston; 7933 Kingston; 8104 Kingston; 8030 Marquette; 8403 Aberdeen; 8529 Rhodes; 8800 Ada; 9212 Parnell; 1516 E 85th; 1017 W 102nd; 417 Oglesby; 8405 Marquette; 8517 Vernon; 8432 Essex; 8346 Constance; 7953 Woodlawn; 7712 Euclid; 61 E. 92nd; 406 E. 87th; 3723 W. 68th; 3213 Throop; 11318 Church; 10012 LaSalle; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 8107 Kingston; 2129 W. 71st; 6759 Indiana; 5437 Laflin; 9610 Woodlawn; 7304 St. Lawrence; 7760 Coles; 310 E. 50th; 1401 W. 109th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside).

Claims Administration & Objections

JRW 3.10 Continued review and analysis of proof of claims submissions (sole lien) (.8); conference call with K. Duff and M. Rachlis regarding analysis of claims and status of discovery (sole lien) (.9); conference call with K. Duff and M. Rachlis regarding Receiver's position statement (Group 1) (.3); confer with K. Duff and M. Rachlis regarding EB document database (all) (.2); compile materials and related conference with J. Rak regarding claim allocation tracking

spreadsheet (sole lien) (.2); confer with A. Watychowicz and K. Duff regarding claimant inquiry and property groupings (all) (.2); confer with A. Watychowicz regarding claimant distribution list and claimant inquiry (Group 1) (.1); review updated claims spreadsheet related to sole claims for various properties from J. Rak, further revise, and related telephone conference with J. Rak and exchange of correspondence with K. Duff and M. Rachlis (sole lien) (.4).

Claims Administration & Objections

1/25/2022 MR

2.00 Prepare for meeting on sole lien claims (sole lien) (.5); conference with K. Duff and J. Wine regarding discovery issues and analysis of claims (sole lien) (1.0); confer with K. Duff and J. Wine regarding position statement planning (Group 1) (.3); confer with K. Duff and J. Wine regarding EB records database (all) (.2).

Claims Administration & Objections

1/26/2022 AW

3.90 Attention to email from counsel for institutional lender regarding reports on specific properties, research supporting documents and Receiver's filings, and related email to M. Rachlis (7508 Essex; 4315 Michigan) (.7); call with J. Wine regarding communication issues for claimant, work on resolution of problem, and related emails to claimants (Group 1) (.8); respond to claimant regarding filing of position statements (Group 1) (.1); work on review of claimants' position statements and redactions (Group 1) (2.3).

Claims Administration & Objections

JRW

5.90 Exchange correspondence with M. Rachlis and A. Watychowicz regarding inquiry from claimant 's counsel regarding property address and related research (4317 Michigan) (.2); exchange correspondence with K. Duff regarding claimants' position statements (Group 1) (.1); confer with K. Duff and M. Rachlis regarding proof of claim and related correspondence to E. Duff and A. Porter (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside) (.3); continued review and analysis of claims and related database searches (sole lien) (4.3); telephone conferences with A. Watychowicz regarding claimants' position statements and Group 1 distribution list and review and revise draft correspondence to claimant (Group 1) (.3); exchange correspondence with claimants' counsel regarding lack of response to subpoena (sole lien) (.1); prepare analysis of claim and related correspondence with K. Duff and M. Rachlis (sole lien) (.4); confer with A. Watychowicz and correspondence with vendor regarding document database searches (all) (.2).

Indiv Hours Description Date 1/26/2022 MR 0.40 Exchange regarding issue of timing for distribution of position statements (Group 1) (.1); attention to emails regarding issues on review of sole lien claims and proof of claims (sole lien) (.3). Claims Administration & Objections 1/27/2022 AW 3.90 Call with J. Wine and database vendor regarding search issues and possible access extension (all) (.5); call with J. Wine regarding claimants' position statements (Group 1) (.2); work on follow up response to claimant with email issues (Group 1) (.2); correspond with J. Wine regarding received claimants' position statements (Group 1) (.1); attention to received claimants' position statements, forward filed statements to counsel, review received statements, and redactions (Group 1) (2.7); draft email to claimants regarding stricken hearing and send same (Group 1) (.2). Claims Administration & Objections **JRW** 3.20 Exchange correspondence and telephone conference with database vendor and A. Watychowicz regarding search and export strategies (all) (.6); confer with A. Watychowicz regarding message to claimants regarding upcoming hearing (all) (.1); review court order and related email to counsel regarding videoconferencing (sole lien) (.1); confer with A. Watychowicz regarding claimant position statements and service of same (Group 1) (.3); review documents produced pursuant to subpoena and additional database searches (sole lien) (1.1); conference with M. Rachlis and K. Duff regarding analysis of claims and to prepare for upcoming hearing (sole lien) (.9); review court order terminating hearing and related correspondence with claimants' counsel (sole lien) (.1). Claims Administration & Objections MR 2.00 Preparation for upcoming meeting and hearing regarding claims review and disclosures for Group 1 and start review of same (Group 1) (.8); conferences and issues regarding sole lien issues with J. Wine and K. Duff (sole lien) (.9); attention to and follow up on sole lien (sole lien) (.3). Claims Administration & Objections 1/28/2022 AW 3.10 Call with J. Wine regarding position statements (Group 1) (.3); attention to received position statements, forward filed statements to counsel, review received statements, and redactions (Group 1) (1.8); call with J. Rak regarding further review of position statements (Group 1) (.4); draft response to claimants regarding position statements submitted after deadline and related email exchange with J. Wine (Group 1) (.2); forward position statements to claimant (Group 1) (.2); research and communicate with claimant regarding access to claims files (5001 Drexel; 6437 Kenwood; 6217 Dorchester; 11117 Longwood) (.2). Claims Administration & Objections ED 0.50 Telephone conference with J. Wine to discuss analysis of loan history documents (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403

Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd;

6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside).

Claims Administration & Objections

1/28/2022 JR

0.40 Exchange communication with A. Watychowicz requesting a review of redacted position statements related to claimants (3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance) (.3); communication with J. Wine requesting status on future steps on claimant position statement in anticipation of the upcoming filing (3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance) (.1).

Claims Administration & Objections

JRW

3.00 Attention to claimant inquiry regarding position statement (Group 1) (.1); exchange correspondence regarding court hearing and notice to claimants (all) (.1); exchange correspondence with M. Rachlis regarding Receiver's position statement and related review of spreadsheets (Group 1) (.6); confer with J. Rak regarding claim analysis for position statement (Group 1) (.1); review draft joint status report and related correspondence with claimants' counsel (Group 1) (.1); confer with M. Rachlis regarding status and planning for single claim process (sole lien) (.1); telephone conference with E. Duff regarding claim analysis (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 5437 Laflin; 6759 Indiana; 9610 Woodlawn; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside) (.5); exchange correspondence with vendor regarding claimant inquiry (all) (.1); legal research for position statements (all) (.6); review position statements (Group 1) (.7).

Claims Administration & Objections

**JRW** 

0.20 Correspondence with claimants' counsel regarding subpoena, related USPS tracking and correspondence to K. Duff (1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8529 Rhodes; 11318 Church; 2129 W 71st; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon).

Claims Administration & Objections

MR

3.40 Attention to various issues on position statements and form and substance for response to same (Group 1) (.8); continue review of position statements and related exchanges with J. Wine (Group 1) (2.2); attention to various issues regarding discovery and items to follow up and related exchanges with J. Wine (sole lien) (.2).

Indiv Hours Description Date 1/31/2022 AW 1.40 Attention to and response to claimant regarding sold properties (638 Avers; 7844 Ellis) (.1); prepare files for claimant and related email (5001 Drexel; 6437 Kenwood; 6217 Dorchester; 11117 Longwood) (.2); update position statements and an index and related email to J. Wine (Group 1) (.4); attention to emails regarding access to database and related email exchanges with J. Wine (all) (.2); review further redactions to position statements and related email to J. Rak (Group 1) (.3); research claim and related email to J. Wine (all) (.2). Claims Administration & Objections JR 6.10 Review position statements for personal information (3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance) (1.8); exchange correspondence with A. Watychowicz regarding additional items on claimant positions statements that need to be redacted (3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance) (.1); exchange correspondence with J. Wine regarding review of all claims against property (7625 S East End) (.8); review and update spreadsheet containing claimant's claim information for property (7635 S East End) (3.4). Claims Administration & Objections **JRW** 5.70 Exchange correspondence with claimants' counsel regarding service of subpoena (sole lien) (.1); conference with J. Rak regarding claims analysis for Receiver's submission (Group 1) (.8); analyze position statements filed by claimants (Group 1) (4.3); attention to correspondence from claimants and counsel regarding EquityBuild documents database (Group 1) (.4); exchange correspondence regarding claimants' request for passwords for recovered records (all) (.1). Claims Administration & Objections MR 0.20 Attention to various issues on claims library and other related issues (Group 1) (.1); attention to status on discovery on sole lien matters (sole lien) (.1). Claims Administration & Objections SUBTOTAL: 116.00 28734.00] Status Reports 1/3/2022 ED 0.30 Call with J. Wine to discuss process for allocation of insurance refunds to sold properties. Status Reports 0.40 Research regarding traffic in Receiver's and claims' email accounts and 1/11/2022 AW related email to J. Wine. Status Reports

Date	Indiv	Hours	Description
1/11/2022	ED	0.10	Email correspondence with J. Wine regarding status of property financial reporting.
			Status Reports
	JRW	2.30	Begin drafting fourth quarter 2021 status report and related correspondence to team regarding items needed.
			Status Reports
1/12/2022	AW	0.10	Follow up communication with J. Wine regarding email traffic in Receiver's and claims' accounts.
			Status Reports
	KMP	3.10	Begin preparation of financial exhibits for 4Q2021 status report.
			Status Reports
1/13/2022	KMP	1.40	Work on preparation of financial exhibits for 4Q2021 status report.
			Status Reports
1/14/2022	KMP	3.20	Continue work on preparation of financial exhibits for 4Q2021 status report.
			Status Reports
1/17/2022	KMP	2 70	Continue work on preparation of financial exhibits for 4Q2021 status report.
171772022	IXIVII	2.10	Continue work on preparation of infancial exhibits for 4 Q2021 status report.
			Status Reports
1/18/2022	JRW	0.20	Review financial schedules for fourth quarter 2021 status report.
			Status Reports
	KMP	0.80	Continue work on preparation of financial exhibits for 4Q2021 status report and related communication with J. Wine.
			Status Reports
1/20/2022	JRW	4.20	Continued preparation of fourth quarter status report and related communications with K. Pritchard regarding revision of financial exhibits.
			Status Reports
	KMP	0.50	Update spreadsheet detailing current property account balances to include additional property, revise master asset list for 4Q2021 status report, and related communications with J. Wine.
			Status Reports

Date	Indiv	<u>Hours</u>	Description
1/21/2022	JR	0.20	Review email from J. Wine, review property tax balances and respond regarding same for property (7109 Calumet).
			Status Reports
	JRW	1.80	Revise exhibits and revise and circulate draft status report.
			Status Reports
	KMP	1.10	Communications with J. Wine regarding certain issues relating to spreadsheets for 4Q2021 status report and update and revise spreadsheets.
			Status Reports
1/22/2022	AEP	0.60	Read, edit, and revise proposed insert to 4th Qtr status report regarding state court litigation.
			Status Reports
1/24/2022	AW	0.60	Communicate with J. Wine regarding master claims list and prepare exhibit to status report.
			Status Reports
	JRW	1.00	Revisions to fourth quarter status report and confer with K. Pritchard and A. Watychowicz regarding exhibits to same.
			Status Reports
	KMP	0.60	Prepare electronic files for exhibits to 4Q2021 status report and related communications with J. Wine and A. Watychowicz.
			Status Reports
1/25/2022	JRW	2.40	Review revisions, further revise and finalize draft fourth quarter 2021 status report, and related correspondence to SEC (.7); study spreadsheets regarding net sales proceeds and account balances and related correspondence with K. Duff and J. Rak and revision of exhibit to status report (1.7).
			Status Reports
	KMP	0.30	Revise certain exhibits for 4Q2021 status report and related communications with J. Wine.
			Status Reports
	MR	0.50	Attention to draft status report and follow up regarding same.
			Status Reports
1/31/2022	AW	0.10	Attention to status report and email counsel regarding transmittal email to claimants.
			Status Reports

<u>Date</u>	Indiv	Hours	Description		
1/31/2022	JRW	0.40	Revise and finalize fourth quarter status report for filing.		
			Status Reports		
	KMP	0.40	Revise, finalize and file Receiver's 14th status report and communications with EB team.	d exhibits, and	related
			Status Reports		
	MR	0.30	Review draft status report and revisions and related con	nmunications.	
			Status Reports		
SUBTOTAL:				 [29.60	6070.00]
Tax Issues					
1/17/2022	KMP	1.60	Review spreadsheets and other materials to compile list for various properties, review tax documents and notice authority claims against ownership entities, and prepare to tax claims (Group 1; sole lien) (1.4); confer with A. Wainformation relating to tax authority claims submitted agentities through receivership claims process (.2).	es to identify ta espreadsheet r atychowicz to r	x relating request
			Tax Issues		
1/18/2022	JRW	0.20	Review correspondence and lists regarding tax authority property owners (Group 1; sole lien).	≀ claims agains	st
			Tax Issues		
	KMP	1.90	Communicate with K. Duff and J. Wine regarding analy entities for various properties (Group 1; sole lien) (.2); we spreadsheet detailing communications from tax authority implicated properties and claims relating to withholding a related taxes (1.7).	vork on revising ties to include	g
			Tax Issues		
1/20/2022	KMP	3.90	Continue work on spreadsheet tracking status of notices authorities (2.4); prepare and compile spreadsheets tradisbursements for all receivership accounts for 2021 an administrator pursuant to her request (1.3); forward noti authority relating to EB entity to accountant for review a response (.2).	cking receipts nd transmit to ta ce from tax	and ax
			Tax Issues		
1/21/2022	KMP	3.60	Continue work on spreadsheet tracking status of notices authorities.	received from	n tax
			Tax Issues		

<u>Date</u>	Indiv	Hours	Description
1/24/2022	KMP	2.70	Continue work on spreadsheet tracking status of notices received from tax authorities.
			Tax Issues
1/25/2022	KMP	2.80	Communicate with J. Wine and tax administrator regarding information for forms 1099 (.2); review property account bank records in connection with year-end accounting and related communications with tax administrator (1.5); continue preparation of spreadsheet tracking information relating to notices from tax authorities (1.1).
			Tax Issues
1/26/2022	KMP	1.30	Communicate with vendors and tax administrator regarding requests for forms W9 in connection with preparation of Receivership tax filings, compile received forms, and forward forms to tax administrator (.6): continue work on spreadsheet tracking receipt and status of tax authority and collection notices (.7).
			Tax Issues
1/27/2022	KMP	0.50	Continue work on spreadsheet tracking receipt and status of tax authority and collection notices (.2); finalize and transmit notice letter to tax authority and collection agency regarding tax collection notice for EB entity (6949 Merrill) (.3).
			Tax Issues
1/28/2022	KMP	2.20	Continue work on spreadsheet tracking receipt and status of tax authority and collection notices, and related email communication with K. Duff (1.8); communication with tax administrator regarding her request for additional forms W9 from service providers for preparation of Receivership 2021 tax returns, and related communications with service providers to request forms W9 (.4).
			Tax Issues
SUBTOTAL:			[20.70]

\$61,240.00

279.50

Other Charges			
	Description	_	
Asset Analysis & Recovery			
	Photocopies for January 2022		146.40
SUBTOTAL:		[	146.40]
Business Operations			
	Software license fees for January 2022 (Summ Hosting, \$362.82 (Summit Hosting (December & January, \$181.41/month)); Google Suite, \$96)		458.82
SUBTOTAL:		[	458.82]
Claims Administration & Objections			
	Online research for January 2022		247.27
SUBTOTAL:		[	247.27]
Total Other Charges			\$852.49

Summary of Activity

Odiffinally of Activity			
	Hours	Rate	
Jodi Wine	85.50	260.00	\$22,230.00
Ania Watychowicz	38.30	140.00	\$5,362.00
Justyna Řak	54.40	140.00	\$7,616.00
Kathleen M. Pritchard	57.80	140.00	\$8,092.00
Andrew E. Porter	4.00	390.00	\$1,560.00
Ellen Duff	17.70	390.00	\$6,903.00
Michael Rachlis	25.70	390.00	\$10,023.00

# **SUMMARY**

Legal Services	\$61,786.00
Other Charges	\$852.49
TOTAL DUE	\$62,638.49

# Case: 1:18-cv-05587 Document #: 1251 Filed: 05/16/22 Page 106 of 162 PageID #:65701 Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

May 3, 2022

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No. 6622143

Legal Fees for February 2022 \$84,938.00

Expenses Disbursed \$1,536.45

Due this Invoice \$86,474.45

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description	
Asset Analysis & Recovery				
2/4/2022	JRW	0.20	Research regarding vendor and related correspondence to K. Duff.	
			Asset Analysis & Recovery	
2/10/2022	AW	0.90	Confer with K. Duff regarding records for potential recovery and research various records.	
			Asset Analysis & Recovery	
2/15/2022	AW	1.90	Call with K. Duff regarding subpoena (.1); email exchange with K. Duff regarding proposed search terms for response to subpoena (.1); work to compile emails responsive to subpoena and related email exchanges with K. Duff (1.7).	
			Asset Analysis & Recovery	
2/21/2022	AW	1.10	Prepare materials responsive to subpoena for K. Duff's review (.1); communicate with K. Duff regarding review process and responsive documents organized in keyword specific folders relating to subpoena (.4); draft certificate of authenticity and waiver of appearance and related exchange with K. Duff (.4); attention to received documents responsive to subpoena and related communication with J. Wine and K. Pritchard (.2).	
			Asset Analysis & Recovery	
2/22/2022	AW	0.50	Complete certificate of authenticity and waiver of appearance and work with K. Duff and government on transmission of responsive documents relating to subpoena.	
			Asset Analysis & Recovery	
SUBTOTAL:			[ 4.60 668	.00]
Asset Disposition				
2/2/2022	AEP	0.20	Read e-mail correspondence relating to CHA inspection at receivership property and prepare e-mail to buyer's counsel asking whether purchaser will absorb the anticipated cost of the demanded improvements in order to ensure renewal of subsidized tenancy (7109 Calumet).	
			Asset Disposition	
	JR	0.10	Communication with K. Duff following up on building unit issues (7109 Calumet).	
			Asset Disposition	
2/4/2022	AEP	1.50	Review closing documents and update closing checklist, prepare addendum to purchase and sale agreement, review and approve lien waivers and brokerage commission statement, request and reconcile updated title invoice	

Date	<u>Indiv</u> <u>I</u>	<u>Hours</u>	Description
			with closing figures, revise property tax prorations, and update master portfolio spreadsheet in connection with closing of receivership property (7109 Calumet).
			Asset Disposition
2/4/2022	JRW	0.40	Search court docket, review pleadings, and related update to team (4533 Calumet).
			Asset Disposition
2/7/2022	JR	0.40	Review email from property management requesting updated rent roll for property, update certified rent roll (7109 Calumet).
			Asset Disposition
	MR	0.10	Follow up on issues related to sale of property (7109 Calumet).
			Asset Disposition
2/8/2022	JR	3.30	Review and prepare closing documents in anticipation for closing (7109 Calumet) (3.1); exchange correspondence with A. Porter requesting information in preparation for closing (7109 Calumet) (.1); communication with K. Duff and A. Porter requesting to schedule execution of documents in anticipation for closing (7109 Calumet) (.1)
			Asset Disposition
2/9/2022	JR	1.60	Communication with A. Watychowicz regarding execution of documents in preparation for closing property (7109 Calumet) (.1); follow up communication with buyer and counsel requesting approval of notices to tenants in preparation for closing (7109 Calumet) (.1); update closing documents and forward to property management for execution (7109 Calumet) (.5); review tenant leases and subsidy agreements and update certified rent roll (7109 Calumet) (.9).
			Asset Disposition
2/10/2022	JR	0.40	Review email from property management regarding execution of documents for closing (7109 Calumet) (.1); further communication with property management requesting updated leases and subsidy agreements for residents (7109 Calumet) (.2); exchange communication with surveying company and request update to certified parties for survey (7109 Calumet) (.1).
			Asset Disposition
2/11/2022	JR	1.00	Review email from property management related to requested leases and subsidy agreements, update rent roll and further communicate with property management requesting additional missing leases and subsidy agreements in preparation for closing (7109 Calumet).
			Asset Disposition

Date	<u>Indiv</u>	<u>Hours</u>	Description	
2/11/2022	MR	0.10	Attention to issues regarding letter of credit (7109 Calumet).	
			Asset Disposition	
2/15/2022	AW	0.10	Attention to letter of credit amendment requested by lender's bank and email M. Rachlis fully executed document (7109 Calumet).	
			Asset Disposition	
	MR	0.40	Review issues on property sale and follow up (7109 Calumet).	
			Asset Disposition	
2/21/2022	AW	0.10	Assist with execution of power of attorney materials for sale of property and related communication with J. Wine (7109 Calumet).	
			Asset Disposition	
2/22/2022	JR	0.40	Review email from property management regarding requested due diligence documents (7109 Calumet).	
			Asset Disposition	
2/23/2022	JR	1.20	Review email from buyer's counsel requesting information for closing and provide same (7109 Calumet) (.1); review and prepare closing documents for closing (7109 Calumet) (.8); further communicate with property management requesting property financial reports in anticipation for closing (7109 Calumet) (.3).	
			Asset Disposition	
2/26/2022	AEP	0.80	Review all final drafts of closing documents associated with prospective sale of receivership property, reconcile settlement statement, review buyer signed documents, and prepare deed and money escrow instructions (7109 Calumet).	
			Asset Disposition	
2/28/2022	AEP	1.80	Revise seller documents for notarization by escrow agent, assemble seller document package, final review and reconciliation of settlement statement, final review and analysis of certified rent roll, review of water invoices and computation of water prorations, and communications with J. Rak regarding same, and communications with escrow agent regarding mechanics of closing (7109 Calumet).	
			Asset Disposition	
	JR	4.20	Exchange correspondence with property management requesting information related to property in preparation for closing (7109 Calumet) (.3); review ledgers and update certified rent roll for closing (7109 Calumet) (1.8); exchange communication with A. Porter providing final information and documentation for closing (7109 Calumet) (.9); review email from buyer's counsel requesting updated utility bills and update electronic files (7109 Calumet) (.7); review emails related to property key arrangement and respond accordingly (7109 Calumet) (.3); exchange correspondence with all parties confirming the closing of sale of property (7109 Calumet) (.1); exchange	

	<u>Date</u>	Indiv	<u>Hours</u>	Description
				correspondence with tax firm providing details of final closing (7109 Calumet) (.1).
				Asset Disposition
	2/28/2022	KMP	0.20	Communicate with K. Duff and J. Rak regarding sale of property and review bank records to follow up on deposit of proceeds (7109 Calumet).
				Asset Disposition
SUBTOT	AL:			[18.30 3835.00]
Business	Operations	1		
	2/1/2022	JRW	0.20	Confer with K. Pritchard regarding state court matter and review documentation from E. Duff (1700 Juneway).
				Business Operations
		KMP	0.30	Communicate with J. Wine and insurer regarding identification of property for insurance claim (1700 Juneway) (.2); review communications from J. Wine and E. Duff providing identity of property relating to insurance claim (1700 Juneway) (.1).
				Business Operations
	2/2/2022	JRW	0.40	Telephone conference with insurance adjuster regarding claims and deductibles (1700 Juneway; 7748 Essex) (.1); review state court complaint and related correspondence with K. Duff (1700 Juneway) (.3).
				Business Operations
		KMP	0.10	Further communications with J. Wine and insurer regarding identification of property for insurance claim (1700 Juneway).
				Business Operations
	2/4/2022	JR	1.40	Update property insurance endorsement spreadsheet related to premium refunds (all).
				Business Operations
		MR	0.20	Attention to issues regarding stay of state court action (4533 Calumet).
				Business Operations
	2/7/2022	AW	0.60	Attention to motion to intervene, related email exchange with counsel, and docket update (defer) (.2); communicate with M. Rachlis and J. Wine regarding motion to retain counsel and potential revisions, finalize motion and file with court (all) (.4).
				Business Operations

2/11/2022 JRW 0.20 Confer with defense counsel regarding upcoming trial (7748 Essex).

#### **Business Operations**

2/22/2022 ED

0.30 Call with J. Rak to discuss resolution of missing information regarding insurance expenditures by property and review of documents prepared by J. Rak (5001 Drexel; 6751 Merrill; 7110 Cornell; 431 E 42nd; 2800 E 81st; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 S Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7237 Bennett; 6217 Dorchester; 1102 Bingham; 638 Avers).

#### **Business Operations**

JR 0.40 Communication with E. Duff regarding property insurance endorsements (7201 Constance; 7110 Cornell; 5618 MLK, 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church: 3213 Throop: 3723 W 68th: 406 E 87th: 61 E 92nd: 6554 Rhodes: 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (.2); further communication with advisor requesting policy information (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance: 8432 Essex: 8517 Vernon: 2129 W 71st: 9610 Woodlawn: 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (.2).

#### **Business Operations**

2/28/2022 JR

0.70 Exchange communication with E. Duff related to review of final property endorsements and refunds from insurance firm (7201 Constance; 7110 Cornell; 5618 MLK, 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (.2); review emails from insurance firm related to premium refunds (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W

<u>Date</u>	<u>l</u>	<u>Indiv</u>	<u>Hours</u>	Description
				83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (.5).
				Business Operations
SUBTOTAL:				[ 4.80 893.00]
Case Administra	ation		_	
2/1/20	)22	AW	0.30	Attention to filed status report and serve as per service list.
				Case Administration
	,	JRW	0.20	Telephone and email correspondence with documents vendor.
				Case Administration
2/2/20	100	C7	0.40	
2/3/20	)22 ,	SZ	0.10	Attention to notice of filing of position statement email and communication with A. Watychowicz about same.
	Case Administration		Case Administration	
2/4/2022 JR 0.40 Review paper copies of property tax statements family).		Review paper copies of property tax statements received in the mail (single family).		
				Case Administration
2/7/20	)22	AW	1.80	Revisions and updates to web page (1.6); communicate with counsel regarding rescheduled hearing (sole lien) (.2).
				Case Administration
2/8/20	)22	AW	0.10	Attention to entered order regarding granted motions and status and update docket (sole lien).
				Case Administration
2/9/20	)22	AW	0.10	Attention to entered stipulation and related email to counsel.
				Case Administration
	,	JR	3.60	Consolidate bank statements for January 2022.
				Case Administration
2/15/2	2022	KMP	0.20	Communications with bank representative and K. Duff regarding status.
				Case Administration

	<u>Date</u>	Indiv	<u>Hours</u>	Description
	2/25/2022	SZ	3.20	Review of documents filed in the receivership action and published on the Receiver's webpage in comparison to court's docket.
				Case Administration
	2/28/2022	AW	2.00	Work on update to receivership web page including missing pleadings from 2021 and related email to K. Duff.
				Case Administration
SUBTOT	ΓAL:			[12.00 1605.00]

### Claims Administration & Objections

2/1/2022 AW

2.10 Continue review and redactions to position statements (Group 1) (1.3); prepare share file for counsel and related email (sole lien) (.1); research native files prepared for prior filings and related email to J. Wine (all) (.2); review claim and related email to J. Wine (Group 1) (.4); attention to email regarding EB documents database and related exchange (all) (.1).

Claims Administration & Objections

JR 8.50 Exchange communication with J. Wine requesting to verify review of information for claimants (7625 East End) (.1); extensive review and update of claims related to properties in anticipation for filing the position statements (7635 East End; 7750 Muskegon) (8.4).

Claims Administration & Objections

JRW 5.60 Continued review and analysis of claimants' position statements (Group 1) (4.4); work with J. Rak on continued analysis of claims and EquityBuild records (Group 1) (.3); confer with EB documents database vendor regarding claimants' request (all) (.2); email and telephone conference with K. Duff regarding EquityBuild documents (all) (.3); correspondence to claimants' counsel regarding EquityBuild documents (all) (.1); attention to claimant inquiries (all) (.3).

Claims Administration & Objections

2/2/2022 AW

3.60 Prepare draft notice of filing of position statements, email exchanges regarding proposed revisions, and label statements pursuant to draft notice (Group 1) (3.2); follow up email exchange regarding review of claim (Group 1) (.1); attention to email from claimant regarding position statement and representation, exchange with counsel, and related email to claimant (Group 1) (.2); attention to voice message and email from claimant, draft response for counsel review, and related email to claimant (all) (.1).

Date	Indiv	<u>Hours</u>	Description
2/2/2022	JR	7.60	Extensive review and update of claims against properties in anticipation for filing position statement (7750 S Muskegon; 7201 Constance) (6.9); communication with J. Wine regarding analysis of claims (7750 Muskegon; 7625 East End; 7635 East End; 3074 Cheltenham) (.7).
			Claims Administration & Objections
	JRW	5.40	Confer with A. Watychowicz regarding EB documents hard drive related to database (all) (.1); confer with J. Rak and A. Watychowicz regarding claims review (Group 1) (.2); attention to claimant inquiries (all) (.2); continued review of position statements and related database searches (Group 1) (4.2); review draft joint status report and related correspondence with K. Duff, M. Rachlis and claimants' counsel (Group 1) (.1); telephone conference with claimants' counsel regarding EB documents drive (all) (.2); correspondence to vendor regarding EB documents database options (all) (.1); review and revise draft notice of filing position statements and related correspondence with A. Watychowicz (Group 1) (.3).
			Claims Administration & Objections
	MR	0.30	Follow up on claimant's request (all) (.1); attention to Group 1 status report and related follow up (Group 1) (.2).
			Claims Administration & Objections
2/3/2022	AW	AW 4.20	Update claimant's contact information and related email (all) (.2); attention to emails from claimants requesting updates on claims process, properties' sale, access to claims documentation and related email responses (all) (1.1); continue work on finalization of notice of filing of position statements, related email exchanges with counsel, file with court and serve as per service list (Group 1) (2.9).
			Claims Administration & Objections
	JR	6.40	Review email from A. Watychowicz requesting a review of notice of filing and exhibits related to the position statement exhibits and respond accordingly (Group 1) (.1); review the notice of filing and the exhibits related to position statements submitted by claimants, correspond with A. Watychowicz regarding same (Group 1) (.8); extensive review and update of claims related to properties in anticipation for filing the position statement received (3074 Cheltenham) (5.4); communication with J. Wine regarding analysis of claims (3074 Cheltenham) (.1).
			Claims Administration & Objections
	JRW	1.90	Attention to claimant inquiries (all) (.3); exchange correspondence with claimants' counsel regarding production documents (Group 1) (.1); continued review and analysis of position statements (Group 1) (.9); correspondence with J. Rak regarding claim analysis (Group 1) (.1); correspond with K. Duff regarding EB documents database (all) (.2); review notice of filing position statements and exhibits thereto and related correspondence and telephone conference with A. Watychowicz regarding format of exhibits (Group 1) (.3).
			Claims Administration & Objections

Date	Indiv	<u>Hours</u>	Description	
2/3/2022	KMP	0.20	Review notice of filing for Group 1 position statements, and related communication with A. Watychowicz (Group 1).	
			Claims Administration & Objections	
	MR	0.30	Attention to submissions of position statements and follow up regarding same (Group 1).	
			Claims Administration & Objections	
2/4/2022	AW	0.50	Attention to emails regarding change of custodian and related email responses (all) (.2); attention to email regarding filed position statements and related email response (Group 1) (.1); communicate with K. Duff and J. Wine regarding late position statement and procedure (Group 1) (.1); call with J. Wine regarding contention discovery (Group 1) (.1).	
			Claims Administration & Objections	
	JRW	1.90	Confer with A. Watychowicz regarding submitted position statements (Group 1) (.1); attention to review and analysis of position statements (Group 1) (1.4); confer with J. Rak regarding claims review (Group 1) (.1); confer with A. Watychowicz regarding discovery responses (Group 1) (.1); correspondence to vendor and claimants' counsel regarding EB documents (all) (.1); exchange correspondence with claimants' counsel regarding motion for entry of stipulated order (defer) (.1).	
			Claims Administration & Objections	
	MR	2.00	Attention to contention discovery and issues on position statements (Group 1).	
			Claims Administration & Objections	
2/7/2022	AW	0.40	Review claim and draft response to follow up regarding position statement option (Group 1) (.2); finalize emails to claimants in response to inquiries (Group 1) (.2).	
			Claims Administration & Objections	
	JRW	4.10	Review correspondence from Judge Lee's clerk, forward to claimants' counsel, and confer with M. Rachlis and A. Watychowicz regarding providing notice of hearing to claimants (all) (.1); review motion for entry of proposed stipulated order (defer) (.1); attention to claimant inquiries and related telephone conference with A. Watychowicz (all) (.3); review notes for upcoming hearing and related correspondence and telephone conference with M. Rachlis and K. Duff (sole lien) (.4); telephone conference with subpoenaed party regarding status of document production and related correspondence (sole lien) (.1); exchange correspondence with claimants' counsel regarding service of subpoena (sole lien) (.1); conference call with M. Rachlis and K. Duff regarding position statement and analysis of claims (Group 1) (.7); continue working on position statement and related legal research and database searches (Group 1) (2.3).	
			Claims Administration & Objections	

Indiv Hours Description Date 2/7/2022 MR 2.50 Review materials for position statement issues (Group 1) (.7.); confer with K. Duff and J. Wine regarding Group 1 position statement and related analysis and issues (Group 1) (.8); prepare for hearing and attention to various sole lien issues (sole lien) (.9); confer with K. Duff and J. Wine regarding sole lien discovery issues (sole lien) (.1). Claims Administration & Objections 2/8/2022 AEP 4.10 Read contention interrogatories, research files, read and analyze documents containing responsive information, and begin preparing draft answers (Group 1). Claims Administration & Objections AW 0.40 Attention to email regarding custodian issue, related search, and response to claimant (all) (.2); attention to discovery responses and related email to J. Wine (Group 1) (.2). Claims Administration & Objections **JRW** 8.00 Attention to claimant inquiry (all) (.1); exchange correspondence with counsel for third party regarding production pursuant to subpoena (sole lien) (.1); confer with M. Rachlis regarding status of discovery and preparation for hearing (sole lien) (.3); appearance at court status hearing (3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella: 8030 Marquette: 8104 Kingston: 8403 Aberdeen: 8529 Rhodes: 11318 Church; 2129 W 71st; 6749 Merrill; 7110 Cornell; 7925 Kingston; 9212 Parnell; 7210 Vernon; 6825 Indiana; 406 E 87th; 6554 Rhodes; 7712 Euclid; 8432 Essex; 3213 Throop; 8107 Kingston; 8346 Constance; 10012 LaSalle; 9610 Woodlawn; 6759 Indiana; 8517 Vernon) (.4); continued analysis of claims for position statement (Group 1) (6.5); exchange correspondence with A. Porter and K. Duff regarding contention interrogatories (Group 1) (.1); telephone conference and exchange correspondence with vendor regarding database export and request for documents from claimant counsel and related follow-up conference with A. Watychowicz (all) (.5). Claims Administration & Objections **KMP** 0.40 Attention to correspondence from third-party in response to subpoena, download document production, and related communications with EB team (sole lien). Claims Administration & Objections MR 4.40 Prepare for hearing and follow up on various sole lien issues (sole lien) (1.0); conferences with J. Wine regarding issues for hearing (sole lien) (.3); attend status conference before Judge Lee (sole lien) (.2); attention to upcoming hearing and review statements of claimants to prepare for upcoming hearing and receiver submission (Group 1) (2.3); attend status conference (Group 1) (.2); attention to interrogatory related issues (Group 1) (.4).

Date	Indiv	<u>Hours</u>	Description
2/9/2022	AEP	2.00	Finalize preparation of draft answers to contention interrogatories (Group 1) (1.8); read revisions prepared by M. Rachlis and prepare responses thereto (Group 1) (.2).
			Claims Administration & Objections
	AW	0.40	Communicate with K. Duff and J. Wine regarding claimant's custodian issue and related email to claimant (all) (.1); communicate with J. Wine regarding claims documentation (4533 Calumet; 8100 Essex; 6217 Dorchester; 816 Marquette; 6355 Talman) (.1); locate and share claims forms with J. Wine (all) (.2).
			Claims Administration & Objections
	JR	0.40	Communication with J. Wine regarding claims and additional supporting documents requested to be consolidated to the filing of the position statements (Group 1).
			Claims Administration & Objections
	JRW	9.90	Continued analysis of claims for position statement (Group 1) (7.6); confer with A. Watychowicz regarding claimant inquiry (all) (.1); attention to drafting and revising response to contention interrogatories (Group 1) (1.8); telephone conference with J. Rak regarding claims analysis (Group 1) (.3); exchange correspondence with vendor regarding EB database exports (all) (.1).
			Claims Administration & Objections
	MR	6.00	Review submission of discovery responses (Group 1) (2.5); review and work on position statement and research regarding same (Group 1) (3.5).
			Claims Administration & Objections
2/10/2022	AEP	0.30	Read, edit, and revise latest draft of answer to contention interrogatories (Group 1).
			Claims Administration & Objections
	AW	1.40	Review claimant's claim form, discovery responses, and position statement to determine claim amounts supported by documents and related communications with J. Wine (Group 1).
			Claims Administration & Objections
	JRW	9.10	Confer with A. Watychowicz regarding claims analysis (Group 1) (.3); exchange correspondence with M. Rachlis regarding position statement (Group 1) (.2); review redlines, further revision and correspondence regarding response to contention interrogatories (Group 1) (.8); continued claims analysis and creation of spreadsheets for position statement (Group 1) (7.8).
			Claims Administration & Objections

Date	Indiv	Hours	Description	
2/10/2022	MR	8.00	Further work on position statements (Group 1) (6.0); work on contention interrogatory answers (Group 1) (2.0).	
			Claims Administration & Objections	
2/11/2022	AEP	1.70	Teleconference with K. Duff, M. Rachlis, and J. Wine regarding finalization of answers to contention interrogatories (Group 1) (1.4); telephone conference with K. Duff, M. Rachlis, and J. Wine regarding broad overview of administration of claims process relating to all creditors (all) (.3).	
			Claims Administration & Objections	
	AW	1.20	Prepare draft notice and communicate with K. Duff regarding notice of filing of late position statement (Group 1) (.3); attention to potential document production, communicate with J. Wine regarding possible redactions, Bates label production, and related email to counsel (Group 1) (.9).	
			Claims Administration & Objections	
	JRW	6.70	Conference with K. Duff, M. Rachlis and A. Porter regarding Group 1 claims analysis and position statement (Group 1) (1.7); confer with K. Duff, M. Rachlis and A. Porter regarding issues relating to distribution of funds (all) (.3); revise claims spreadsheets, compile backup documentation, and related analysis of rollovers (Group 1) (3.1); confer with A. Watychowicz regarding document production (Group 1) (.1); revise, finalize and serve answers to contention interrogatories and document production and related correspondence (Group 1) (1.4); confer with A. Watychowicz regarding notice of filing claimant position statement (Group 1) (.1).	
			Claims Administration & Objections	
	MR	4.30	Work on contention interrogatory drafts and review and revise comments (Group 1) (1.3); further work and review of position statements (Group 1) (1.0); conference with K. Duff, J. Wine, and A. Porter regarding analysis of Group 1 claims and various related issues and development of related spreadsheet for submission (Group 1) (1.7); confer with K. Duff, J. Wine, and A. Porter regarding analysis of claims and distribution issues (all) (.3).	
			Claims Administration & Objections	
2/14/2022	MR	4.50	Work on review of claims and on Receiver's submission (Group 1).	
			Claims Administration & Objections	
2/15/2022	AW	0.70	Attention to emails from claimants regarding defendants and forward to K. Duff and J. Wine (Group 1) (.1); attention to email from claimant regarding deposition and related email exchange with K. Duff and M. Rachlis (Group 1) (.1); research regarding deposition of Receiver and related exchange with M. Rachlis (Group 1) (.3); email K. Duff and M. Rachlis regarding notice of filing of late position statement (Group 1) (.1); communicate with J. Wine regarding email that was removed from Group 1 service email (Group 1) (.1).	
			Claims Administration & Objections	

Date	Indiv	<u>Hours</u>	Description	
2/15/2022	MR	4.50	Continue work on review of claims for Receiver submission (Group 1) (4.0); attention to deposition request associated with discovery (Group 1) (.5).	
			Claims Administration & Objections	
2/16/2022	AW	0.20	Attention to emails in Group 1 emails and related communication with K. Duff (Group 1) (.1); update emailing list (Group 1) (.1).	
			Claims Administration & Objections	
	KMP	0.20	Communications with lender's counsel and J. Wine regarding subpoena (sole lien).	
			Claims Administration & Objections	
	MR	3.80	Follow up on discovery related request (Group 1) (.3); further review of claims (Group 1) (3.5).	
			Claims Administration & Objections	
2/17/2022	JR	1.00	Review email from J. Wine and work to consolidate additional supporting documents for Group 1 claimants (Group 1).	
			Claims Administration & Objections	
	MR	2.60	Further review and follow up regarding claims review (Group 1).	
			Claims Administration & Objections	
2/18/2022	KMP	1.70	Factual research relating to discovery issue and related communications with M. Rachlis (Group 1).	
			Claims Administration & Objections	
2/20/2022	JRW	0.50	Revise Group 1 summary table and related correspondence to M. Rachlis and K. Duff (Group 1).	
			Claims Administration & Objections	
	MR	4.50	Further work and research on receiver submission (Group 1) (2.9); attention to issues on discovery and prepare for upcoming meeting (Group 1) (1.2); exchanges with J. Wine regarding receiver submission (Group 1) (.2); follow up email to counsel for claimant (Group 1) (.2).	
			Claims Administration & Objections	
2/21/2022	AW	0.30	Correspond with J. Wine regarding review of discovery (Group 1) (.1); attention to motion to compel deposition and communicate with counsel regarding presentation requirement (Group 1) (.2).	
			Claims Administration & Objections	

2/21/2022 JRW

7.90 Review notes from meetings with claimants' counsel regarding negotiation regarding claims process in preparation for meet and confer regarding deposition of Receiver and related correspondence with M. Rachlis (Group 1) (.4); conference call with K. Duff and M. Rachlis regarding Receiver's position statement and related claims analysis (Group 1) (1.0); continued analysis of claims and potential set-offs (Group 1) (.9); conference with K. Duff and M. Rachlis in preparation for meet and confer (Group 1) (.2); review deposition transcripts in connection with position statement (Group 1) (.7); meet and confer with claimants' counsel and M. Rachlis regarding request for Receiver's deposition (Group 1) (.3); review motion to compel Receiver's deposition and related conference with K. Duff and M. Rachlis regarding response to same (Group 1) (.8); legal research regarding motion to compel (Group 1) (1.8); continue working with K. Duff and M. Rachlis regarding Receiver's analysis and recommendations regarding claims (Group 1) (1.8).

Claims Administration & Objections

7.40 Prepared for and participated in meet and confer on discovery issues (Group 1) (.8); conferences with J. Wine and K. Duff regarding discovery issues (Group 1) (.8); follow up conference with K. Duff regarding request for deposition (Group 1) (.3); review motion to compel and begin response regarding same (Group 1) (4.5); confer with K. Duff and J. Wine regarding analysis of claims (Group 1) (1.0).

Claims Administration & Objections

2/22/2022 AW

MR

4.60 Research pleadings and transcripts for references regarding discovery issue and related email exchange with M. Rachlis (Group 1) (.7); call with J. Wine and J. Rak regarding review of claims to supplement missing information (Group 1) (.5); work on claims analysis (Group 1) (3.4).

Claims Administration & Objections

JR 3.50 Conference call with J. Wine and A. Watychowicz regarding further review of proof of claims relating to Group 1 properties (Group 1) (.6); further research regarding claimants in Group 1 (Group 1) (2.9).

Claims Administration & Objections

JRW 11.50 Conference with J. Rak and A. Watychowicz regarding additional claims analysis required and related follow-up email (Group 1) (.7); continued review of proofs of claims, position statements, discovery responses and EquityBuild documents, analysis of claims, and updating claims analysis spreadsheet (Group 1) (5.0); attention to drafting and revising Receiver's submission regarding Group 1 claims and related legal research (Group 1) (3.8); extended conference with K. Duff and M. Rachlis regarding Receiver recommendations on Group 1 claims (Group 1) (2.0).

Claims Administration & Objections

MR 8.00 Further work on review of claims (Group 1) (2.5); participate in meeting regarding claims issues with K. Duff and J. Wine (Group 1) (2.0); work on response to motion to compel regarding discovery (Group 1) (3.5).

AW

2/23/2022 AEP 0.30 Participate in portion of conference call with K. Duff, M. Rachlis, and J. Wine regarding claims analysis and related issue (all).

Claims Administration & Objections

3.70 Attention to Group 1 service email, correspond with K. Duff regarding appropriate action, and related email to claimants (Group 1) (.2); finalize notice of filing of claimant's position statement, file with the Court, and serve on claimants (Group 1) (.2); response to claimant's voice message (all) (.1); continue work on claims analysis and related communications with J. Wine (Group 1) (2.3); work on preparation of exhibits to receiver's claims submission (Group 1) (.9).

Claims Administration & Objections

JR 2.20 Extensive research regarding Group 1 claims relating to investor interest and principal returns as well as claimant buyouts (3074 Cheltenham; 7625 East End) (1.9); exchange communication with J. Wine regarding identification of requested claimant information (3074 Cheltenham) (.3).

Claims Administration & Objections

JRW 14.50 Analysis of claims and related conference with A. Watychowicz (Group 1) (1.8); attention to claimant inquiries and confer with A. Watychowicz and K. Duff regarding Group 1 distribution list (.2); review legal research relating to claims issue and related conference with K. Duff, A. Porter and M. Rachlis (all) (.6); exchange correspondence with documents vendor regarding database exports (all) (.2); work with A. Watychowicz to prepare exhibits for Group 1 position statement and related correspondence with K. Duff and M. Rachlis (Group 1) (2.5); continued review of proofs of claims, position statements, discovery responses and EquityBuild documents, analysis of claims, and updating claims analysis spreadsheet (Group 1) (9.2).

Claims Administration & Objections

MR 6.90 Further work on claims and narrative and numerous related exchanges (Group 1) (5.3); conference with J. Wine, A. Porter and K Duff regarding claims issues (Group 1) (.6); additional work and research on response to motion to compel (Group 1) (1.0).

Claims Administration & Objections

2/24/2022 AEP 0.40 Teleconference with J. Wine regarding claims issue related to property liens (7201 Constance; 7625 East End; 3074 Cheltenham).

2/24/2022 AW

8.10 Attention to email from claimant regarding claims process and related response (all) (.1); work on updates to claimants' contact emails (all) (.3); continue work on analysis of claims, review of outstanding discovery, and preparation of exhibits to receiver's submission and communications with J. Wine (Group 1) (7.2); communicate with K. Pritchard regarding research relating to opposition to motion to compel (Group 1) (.3); finalize and file motion for extension (Group 1) (.2).

Claims Administration & Objections

JRW 10.60 Conference call with A. Porter regarding claim priority issues (Group 1) (.5); telephone conference with claimants' counsel regarding motion for deposition and payments to claimant (Group 1) (.2); exchange correspondence and confer with A. Watychowicz regarding claims documentation and exhibits to Receiver's submission and related revision of exhibits (Group 1) (.9); correspond with M. Rachlis regarding content of exhibits to Receiver's submission (Group 1) (.3); continued review of proofs of claims, position statements, discovery responses and EquityBuild documents, analysis of claims, and updating claims analysis spreadsheet (Group 1) (2.1); review claimants' discovery responses and related conferences with A. Watychowicz (Group 1) (5.1); further revisions of Receiver's submission (Group 1) (1.4); review and revise motion for extension and confer with A. Watychowicz regarding filing of same (Group 1) (.1).

Claims Administration & Objections

KMP 4.20 Review various claimants' filings, compile and highlight relevant references, and forward to K. Duff (Group 1) (3.1); study and revise draft submission on Group 1 claims and related communications with A. Watychowicz (Group 1) (1.1).

Claims Administration & Objections

MR 9.00 Work on various elements of submission and various related communications (Group 1) (7.5); further research and work on response to motion to compel regarding discovery (Group 1) (1.5).

Claims Administration & Objections

2/25/2022 AW

3.60 Complete review of outstanding discovery responses, review receiver's submission and communicate with counsel regarding proposed revisions, continue review and finalize exhibits to receiver's submission (Group 1) (3.4); attention to response to motion for extension and motion in opposition to motion to compel and related email exchanges with counsel (Group 1) (.2).

Claims Administration & Objections

JRW 9.00 Continue working with A. Watychowicz on reviewing claimants' discovery responses (Group 1) (1.9); confer with A. Watychowicz regarding mechanics lien claims and related review of motions to confirm sales (Group 1) (.3); legal research and revisions to Receiver's Group 1 submission on claims (Group 1) (3.2); continued refinement of exhibits to Receiver's submission (Group 1)

	Date	Indiv	Hours	Description
				(2.8); correspondence with K. Duff and M. Rachlis regarding document database export and discussions with claimants' counsel (all) (.4); review and revise response to motion to depose receiver (Group 1) (.4).
				Claims Administration & Objections
	2/25/2022	KMP	2.60	Revise, finalize, and file response to motion to compel and related communications with K. Duff, M. Rachlis, and A. Watychowicz (Group 1).
				Claims Administration & Objections
		MR	4.50	Further work on edits to motion to compel and related follow up (Group 1) (2.0); review various items and related communications regarding claims submission (Group 1) (2.5).
				Claims Administration & Objections
	2/27/2022	MR	2.20	Review and revise claims submission and related follow up (Group 1).
				Claims Administration & Objections
	2/28/2022	AW	W 1.70	Review pleadings and communicate with K. Duff regarding independent contractor claim and lien motion (Group 1) (.3); email exchanges with K. Duff, M. Rachlis and J. Wine regarding further revisions to Receiver's submission on Group 1 claims (Group 1) (.4); communicate with J. Wine regarding exhibits and revisions (Group 1) (.3); finalize Receiver's submission, file with Court, and serve as per service list (Group 1) (.6); service of Receiver's opposition to motion to compel to claimants (Group 1) (.1).
Claims Administration & Objections			Claims Administration & Objections	
		JRW	4.80	Review redlines of Receiver's position statement, respond to comments and related communications with M. Rachlis and K. Duff (Group 1) (1.6); correspondence with counsel regarding document production (sole lien) (.2); review legal research and related correspondence with K. Duff (Group 1) (.2); additional review of claimant submission (Group 1) (.3); separate conferences with claimants' counsel and K. Duff regarding document database export and related issues (all) (.5); telephone conference with M. Rachlis regarding transfers of security interest to certain Group 1 claimants (Group 1) (.4); revise and finalize position statement (Group 1) (1.2); revise exhibit to position statement (Group 1) (.4).
				Claims Administration & Objections
		KMP	0.40	Review court's ruling on motion to compel Receiver's deposition (Group 1) (.1); attention to receipt of additional documents produced by claimant, download production documents to network files, and related communications with J. Wine (sole lien) (.3).

	<u>Date</u>	Indiv	Hours	Description		
	2/28/2022	MR	3.40	Further work and review of claims submission (Group with J. Wine regarding claims submission (Group 1) (.ruling on motion to compel (Group 1) (.1).		
				Claims Administration & Objections		
SUBTO	TAL:				<del></del> <del></del> <del></del> <del></del>	77867.00]
Tax Iss	ues		_			
	2/9/2022	KMP	0.30	Briefly review tax forms for EB accounts from bank and of forms to accountant and tax administrator.	d prepare tra	nsmittal
				Tax Issues		
	2/16/2022	KMP	0.20	Review online bank records and communicate with tax regarding property account balance and accrued inter Bennett).		
				Tax Issues		
SUBTO	TAL:				[ 0.50	70.00]
					326.00	\$84,938.00

Other Charges			
	Description	_	
Asset Analysis & Recovery			
	Photocopies for February 2022		2.90
SUBTOTAL:		[	2.90]
Business Operations			
	Software license fees for February 2022 (Summit Hosting, \$181.41; Google Suite, \$96)		277.41
SUBTOTAL:		[	277.41]
Claims Administration & Objections			
	Online research for February 2022		1,256.14
SUBTOTAL:		[	1,256.14]
Total Other Charges		_	\$1,536.45

Summary of Activity

	Hours	D - 1 -	
	<u> 110013</u>	Rate	
Jodi Wine	113.10	260.00	\$29,406.00
Ania Watychowicz	46.60	140.00	\$6,524.00
Justyna Řak	48.70	140.00	\$6,818.00
Kathleen M. Pritchard	11.00	140.00	\$1,540.00
Stoja Zjalic	3.30	110.00	\$363.00
Andrew E. Porter	13.10	390.00	\$5,109.00
Ellen Duff	0.30	390.00	\$117.00
Michael Rachlis	89.90	390.00	\$35,061.00

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# **SUMMARY**

TOTAL DUE	\$86,474.45
Other Charges	\$1,536.45
Legal Services	\$84,938.00

# Case: 1:18-cv-05587 Document #: 1251 Filed: 05/16/22 Page 127 of 162 PageID #:65722 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

May 6, 2022

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No. 6622144

 Legal Fees for March 2022
 \$29,057.00

 Expenses Disbursed
 \$1,124.80

 Due this Invoice
 \$30,181.80

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description			
Accounting/Auditing						
3/7/2022	KMP	0.60	Review online bank records to update account ledgers and prepare schedules of receipts and disbursements for February 2022.			
			Accounting/Auditing			
3/24/2022	KMP	0.20	Confer with K. Duff regarding account balance and deposits to Receiver's account and property account (1414 E 62nd).			
			Accounting/Auditing			
SUBTOTAL:			[ 0.80 112.00]			
Asset Disposition						
3/1/2022	KMP	0.20	Communicate with K. Duff and J. Rak confirming receipt of proceeds from sale of property and advise insurance broker regarding sale of property (7109 Calumet).			
			Asset Disposition			
3/7/2022	KMP	0.20	Communication with K. Duff regarding receipt of post-sale refund of property taxes and deposit to related property account (7109 Calumet).			
			Asset Disposition			
3/17/2022	JR	0.10	Review email from K. Duff related to building violation notice related to sold property, forward same to buyer and buyer's counsel (4533 Calumet).			
			Asset Disposition			
SUBTOTAL:			[ 0.50 70.00]			
Business Operation	s					
3/1/2022	ED	0.40	Review of further documentation sent by insurance agent relating to policy endorsements terminating coverage for properties sold during 2021 (4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester; 1102 Bingham; 638 Avers).			

JR

3/2/2022

1.80 Review emails from account analyst and update spreadsheet related to missing endorsements (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (1.7); follow up communication with account analyst regarding missing endorsements (7201 Constance; 7110 Cornell; 5618 MLK, 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (.1).

**Business Operations** 

3/3/2022 ED

1.00 Review and analysis of insurance policy documents for period beginning May 2021 to identify costs attributable to properties owned during coverage period (4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester; 1102 Bingham; 638 Avers).

**Business Operations** 

ED

0.30 Email to insurance agents requesting further detail relating to insurance policy documents for period beginning May 2021 (4611 Drexel; 1414 E 62nd; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana; 1422 E 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester; 1102 Bingham; 638 Avers).

**Business Operations** 

3/7/2022 ED

0.30 Review documentation regarding termination of property insurance policies (7109 Calumet) (.2); email correspondence to K. Duff regarding execution of documents for termination of property insurance policies (7109 Calumet) (.1).

Date	Indiv	Hours	Description
3/7/2022	JRW	0.10	Telephone conference with defense counsel regarding state court trial (7748 Essex).
			Business Operations
	KMP	0.20	Attention to and briefly review canceled insurance policy documentation (all).
			Business Operations
3/8/2022	AW	0.30	Attention to email regarding online vendor, review IT consultant recommendation, and related email exchanges with K. Duff (defer).
			Business Operations
	JRW	0.10	Conference with K. Duff and M. Rachlis regarding trial in state court matter (7748 Essex).
			Business Operations
	MR	0.10	Meeting with K. Duff and J. Wine regarding potential participation at trial of personal injury action (7748 Essex).
			Business Operations
3/16/2022	AW	0.20	Attention to scanned notices and related email to K. Duff and J. Wine (4533 Calumet; 1516 E 85th; 5001 Drexel).
			Business Operations
	JR	0.50	Review email from insurance broker account manager producing a list of property insurance refunds, brief review of same, correspond with K. Pritchard requesting information related to missing property addresses related to refunds, update missing property information related to insurance premium refunds (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana).
			Business Operations
	JRW	0.60	Attention to notice of ordinance violation and related correspondence to city's ownership dispute division (4533 Calumet) (.2); attention to collection notice and draft letter to counsel (5001 Drexel) (.4).
			Business Operations
	KMP	0.30	Review spreadsheet from insurance broker identifying insurance refunds relating to various properties, and related communications with E. Duff and J. Rak (1422 E 68th; 7255 Euclid; 6949 Merrill; 7110 Cornell; 7656 Kingston; 7201 Constance; 5620 MLK; 7701 Essex; 6217 Dorchester; 2736 W 64th; 2453 E 75th; 4533 Calumet; 816 Marquette; 4317 Michigan; 7442 Calumet;

7237 Bennett; 7255 Euclid; 7024 Paxton; 4750 Indiana; 638 Avers; 1102 Bingham; 4611 Drexel).

**Business Operations** 

3/17/2022 AW

0.80 Draft letter to counsel regarding administrative matter and related email to J. Wine (5001 Drexel) (.1); revision to letter regarding administrative matter and communicate regarding same with J. Wine and K. Pritchard (5001 Drexel) (.2); review letter to plaintiff's counsel, review motion, and email J. Wine regarding proposed revisions (7748 Essex) (.5).

**Business Operations** 

JR 1.80 Review property addresses for various property insurance endorsements related to refunds, update check items spreadsheet with property addresses, communicate with account analyst requesting confirmation on property addresses (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marguette; 8104 Kingston; 8405 Marguette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (1.7); review email from E. Duff related to a review of monthly property reporting for October, November and December of 2020 (6554 Vernon; 1700 Juneway; 7201 Dorchester; 7508 Essex; 431 E 42nd; 7701 Essex; 7442Calumet; 816 Marguette; 6949 Merrill; 4533 Calumet; 4315 Michigan: 7600 Kingston: 7656 Kingston: 1131 E 79th: 6250 Mozart: 4750 Indiana; 7024 Paxton; 7840 Yates; 2800 E 81st; 4611 Drexel; single family; 1422 East 68th; 7255 Euclid; 7237 Bennett; 6217 Dorchester Avenue; 638 Avers; 7109 Calumet) (.1).

**Business Operations** 

JRW 3.20 Review and finalize letter to counsel for city regarding administrative matter (5001 Drexel) (.1); review motion for rule to show cause in state court matter and related telephone conference with defense counsel (7748 Essex) (.6); confer with K. Duff regarding state court motion and related research regarding discovery responses and purported basis for belief (7748 Essex) (.5); draft letter to plaintiff's counsel in state court litigation, related conferences with defense counsel and K. Duff, and exchange of correspondence with M. Rachlis (7748 Essex) (1.6); review and revise letter to plaintiff's counsel demanding withdrawal of baseless motion (7748 Essex) (.4).

**Business Operations** 

KMP 0.70 Attention to communications with insurance broker regarding questions about spreadsheet identifying insurance refunds relating to various properties, and related communications with E. Duff and J. Rak (1422 E 68th; 7255 Euclid; 6949 Merrill; 7110 Cornell; 7656 Kingston; 7201 Constance; 5620 MLK; 7701 Essex; 6217 Dorchester; 2736 W 64th; 2453 E 75th; 4533 Calumet; 816 Marquette; 4317 Michigan; 7442 Calumet; 7237 Bennett; 7255 Euclid; 7024 Paxton; 4750 Indiana; 638 Avers; 1102 Bingham; 4611 Drexel) (.1);

attention to service of process for state court lawsuit by investors and related communications with EB team (defer) (.3); prepare transmittal of response to collection notice and related communications with J. Wine and A. Watychowicz (5001 Drexel) (.3).

**Business Operations** 

3/17/2022 MR

1.20 Review and follow up regarding various issues on emergency motion regarding state court litigation and several related exchanges (7748 Essex) (1.0); attention to new suit and service of same (defer) (.2).

**Business Operations** 

3/18/2022 AW

0.40 Call with J. Wine regarding potential appearance, draft additional appearance, and related email exchanges regarding same (7748 Essex).

**Business Operations** 

ED 0.20 Email correspondence with J. Rak regarding review of additional draft property reports received from accountant (7201 Constance; 7110 Cornell; 5618 MLK, 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana).

**Business Operations** 

2.60 Review monthly property reporting for October, November and December of JR 2020 produced by tax accountant and for various months in 2021 and compare and analyze against property management reporting (7201 Constance; 3074 Cheltenham; 4533 Calumet; 7300 St. Lawrence; 7760 Coles; 9610 Woodlawn; 310 E 50th; 1401 W 109th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 6160 MLK; 1131 E 79th; 6250 Mozart; 6751 Merrill; 7109 Calumet; 638 Avers; 7255 Euclid; 4520 Drexel; 4611 Drexel; 6217 Dorchester; 7924 Paxton; 7110 Cornell; 2736 W 64th; 4317 Michigan; 6356 California; 6357 Talman; 7201 Dorchester; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7953 Marquette; 8326 Ellis; 7442 Calumet; 7701 Essex; 816 Marquette; 7508 Essex; 7051 Bennett; 8201 Kingston; 701 S 5th; 7026 Cornell; 7237 Bennett; 2909 E 78th; 5955 Sacramento; 6001 Sacramento; 7927 Essex; 11119 Longwood; 5450 Indiana; 7749 Yates; 1422 E 68th; 2800 E 81st; 4750 Indiana; 7840 Yates; 7450 Luella; 1700 Juneway; 6949 Merrill; 417 Oglesby; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 61 E 92nd; 406 E 87th; 3213 Throop; 3723 E 68th; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 10012 LaSalle; 11318 Church; 5618 MLK; 6558 Vernon).

3/18/2022 JR

0.30 Exchange detailed communication with E. Duff regarding issues with the reports that were provided by tax accountant, review email from E. Duff related to reporting issues, and further related communications with E. Duff (7201 Constance; 3074 Cheltenham; 4533 Calumet; 7300 St. Lawrence; 7760 Coles; 9610 Woodlawn; 310 E 50th; 1401 W 109th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 6160 MLK; 1131 E 79th; 6250 Mozart; 6751 Merrill; 7109 Calumet; 638 Avers; 7255 Euclid; 4520 Drexel; 4611 Drexel; 6217 Dorchester; 7924 Paxton; 7110 Cornell; 2736 W 64th; 4317 Michigan; 6356 California; 6357 Talman; 7201 Dorchester; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7953 Marguette; 8326 Ellis; 7442 Calumet; 7701 Essex; 816 Marguette; 7508 Essex; 7051 Bennett; 8201 Kingston; 701 S 5th; 7026 Cornell; 7237 Bennett; 2909 E 78th; 5955 Sacramento; 6001 Sacramento; 7927 Essex; 11119 Longwood; 5450 Indiana; 7749 Yates; 1422 E 68th; 2800 E 81st; 4750 Indiana; 7840 Yates; 7450 Luella; 1700 Juneway; 6949 Merrill; 417 Oglesby; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Marguette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 61 E 92nd; 406 E 87th; 3213 Throop; 3723 E 68th; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 10012 LaSalle; 11318 Church; 5618 MLK; 6558 Vernon).

#### **Business Operations**

**JRW** 

1.60 Confer with K. Duff and related telephone conference with state court counsel regarding potential appearance in state court case and review potential appearance form (7748 Essex) (.4); legal research regarding issue related to motion, attend motion hearing in state court litigation and related telephone conference with state court counsel and related email exchange with K. Duff (7748 Essex) (1.2).

**Business Operations** 

MR 0.10 Attention to status on state court hearing and emergency motion (7748 Essex).

**Business Operations** 

3/21/2022 AW

0.20 Obtain a copy of docket in class action matter and related email to K. Duff (defer) (.1); attention to complaint filed in state court, calculate time to answer, and update docket (defer) (.1).

**Business Operations** 

ED

0.10 Call with J. Rak to discuss allocation of insurance premium refunds received (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston;

8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana).

#### **Business Operations**

#### 3/21/2022 ED

0.20 Call with J. Rak to discuss review of draft accounting reports through December 31, 2021 (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana).

#### **Business Operations**

ED 0.80 Begin review of draft reports from accountant for year ended 12/31/2021 (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana).

#### **Business Operations**

JR 1.60 Review email to insurance broker account analyst related to property refunds issued and request confirmation of property addresses related to refund allocations, follow up email to account analyst and E. Duff regarding same (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marguette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (.4); review email from account analyst and update spreadsheet related to property insurance refunds (7201 Constance; 7110 Cornell; 5618 MLK; 6356 California) (.6); further communication with E. Duff related to property report review for October, November, December 2020 and all months in 2021 regarding reporting issues (all) (.6).

#### **Business Operations**

KMP 0.50 Attention to communications with insurance broker regarding identification of refunds for terminated coverage on sold properties (5618 MLK; 6356 California; 7110 Cornell; 7201 Constance; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529

Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (.2); communications with K. Duff and J. Wine regarding identification and tracking of various expenses in connection with motion for expense restoration (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis) (.3).

#### **Business Operations**

#### 3/22/2022 KMP

1.20 Work on spreadsheet identifying and tracking various expenses in connection with motion for expense restoration (1017 W 102nd; 1102 Bingham; 1401 W 109th; 1414 E 62nd; 1422 E 68th; 1516 E 85th; 11117 Longwood; 1700 Juneway; 2129 W 71st; 2909 E 78th; 2136 W 83rd; 3030 E 79th; 310 E 50th; 3213 Throop; 3723 W 68th; 406 E 87th; 417 Oglesby; 4520 Drexel; 4611 Drexel; 5001 Drexel; 5437 Laflin; 5450 Indiana; 5955 Sacramento; 6001 Sacramento; 61 E 92nd; 6160 MLK; 6217 Dorchester; 638 Avers; 6437 Kenwood; 6554 Rhodes; 6749 Merrill; 6759 Indiana; 6807 Indiana; 6825 Indiana; 6949 Merrill; 701 S 5th; 7026 Cornell; 7109 Calumet; 7110 Cornell; 7210 Vernon; 7237 Bennett; 7300 St. Lawrence; 7301 Stewart; 7420 Colfax; 7450 Luella: 7500 Eggleston: 7546 Saginaw: 7547 Essex: 7600 Kingston: 7625 East End; 7635 East End; 7656 Kingston; 7712 Euclid; 7748 Essex; 7749 Yates; 7750 Muskegon; 7760 Coles; 7834 Ellis; 7922 Luella; 7925 Kingston; 7927 Essex; 7933 Kingston; 7953 Woodlawn; 8000 Justine; 8030 Marquette; 8047 Manistee; 8100 Essex; 8104 Kingston; 8107 Kingston; 8201 Kingston; 8209 Ellis; 8214 Ingleside; 8326 Ellis; 8334 Ellis; 8342 Ellis; 8346 Constance; 8352 Ellis; 8403 Aberdeen; 8405 Marquette; 8432 Essex; 8517 Vernon; 8529 Rhodes; 8800 Ada; 9212 Parnell; 9610 Woodlawn; 10012 LaSalle; 11318 Church).

#### **Business Operations**

#### 3/23/2022 JR

2.30 Review property management reports prepared by tax firm related to property reporting and prepare a list of reports requiring further review (7201 Constance; 3074 Cheltenham; 4533 Calumet; 7300 Lawrence; 7760 Coles; 9610 Woodlawn; 310 E 50th; 1401 W 109th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside) (.7); exchange correspondence with tax analyst requesting additional reporting for various months in 2021 (all) (.2); extensive review of monthly property reports for all of 2021 (all) (1.4).

3/23/2022 KMP

2.50 Review bank statements and schedules of receipts and disbursements to prepare spreadsheet identifying and tracking various property-related deposits to Receiver's accounts in connection with motion for expense restoration and related conference with K. Duff (1017 W 102nd; 1102 Bingham; 1401 W 109th; 1414 E 62nd; 1422 E 68th; 1516 E 85th; 11117 Longwood; 1700 Juneway; 2129 W 71st; 2909 E 78th; 2136 W 83rd; 3030 E 79th; 310 E 50th; 3213 Throop; 3723 W 68th; 406 E 87th; 417 Oglesby; 4520 Drexel; 4611 Drexel; 5001 Drexel; 5437 Laflin; 5450 Indiana; 5955 Sacramento; 6001 Sacramento; 61 E 92nd; 6160 MLK; 6217 Dorchester; 638 Avers; 6437 Kenwood; 6554 Rhodes; 6749 Merrill; 6759 Indiana; 6807 Indiana; 6825 Indiana; 6949 Merrill; 701 S 5th; 7026 Cornell; 7109 Calumet; 7110 Cornell; 7210 Vernon; 7237 Bennett; 7300 St. Lawrence; 7301 Stewart; 7420 Colfax; 7450 Luella; 7500 Eggleston; 7546 Saginaw; 7547 Essex; 7600 Kingston; 7625 East End; 7635 East End; 7656 Kingston; 7712 Euclid; 7748 Essex; 7749 Yates; 7750 Muskegon; 7760 Coles; 7834 Ellis; 7922 Luella; 7925 Kingston; 7927 Essex; 7933 Kingston; 7953 Woodlawn; 8000 Justine; 8030 Marquette; 8047 Manistee; 8100 Essex; 8104 Kingston; 8107 Kingston; 8201 Kingston; 8209 Ellis; 8214 Ingleside; 8326 Ellis; 8334 Ellis; 8342 Ellis; 8346 Constance; 8352 Ellis; 8403 Aberdeen; 8405 Marquette; 8432 Essex; 8517 Vernon; 8529 Rhodes; 8800 Ada; 9212 Parnell; 9610 Woodlawn; 10012 LaSalle; 11318 Church).

# **Business Operations**

3/24/2022 ED

0.20 Email correspondence with accountants and J. Rak regarding content and presentation of reporting for all properties pending allocation of insurance refunds and allocation of fees and expenses for all properties (all).

# **Business Operations**

JR
1.50 Review emails and exchange correspondence with insurance broker account analyst requesting updates to property insurance refunds (all) (.3); extensive review of monthly property reports for all of 2021 (2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana) (.9); exchange correspondence with account manager and request further information for all

#### **Business Operations**

property reporting (all) (.3).

JRW 1.30 Review and revise spreadsheets tracking expenses and draft restoration motion and related correspondence to K. Pritchard (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis).

3/24/2022 KMP

0.80 Communicate with J. Wine regarding various issues relating to motion for expense restoration and review related checklist and spreadsheet prepared by J. Wine (1102 Bingham; 1401 W 109th; 1414 E 62nd; 1700 Juneway; 2736 W 64th; 4533 Calumet; 4611 Drexel; 5618 MLK; 6160 MLK; 6217 Dorchester; 6554 Rhodes; 6825 Indiana; 7051 Bennett; 7109 Calumet; 7201 Constance; 7210 Vernon; 7635 East End; 7656 Kingston; 7748 Essex; 7749 Yates; 7834 Ellis; 8201 Kingston; 8326 Ellis).

**Business Operations** 

KMP 0.20 Attention to communications with insurance broker regarding spreadsheet tracking refunds for terminated property and GL insurance coverage (5618 MLK; 6356 California; 7110 Cornell; 7201 Constance; 2800 E 81st; 4611 Drexel; 1017 E 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 1401 W 109th; 310 E 50th; 6807 Indiana).

**Business Operations** 

3/25/2022 KMP

2.70 Continue work on spreadsheets relating to receipts and expenses for motion for expense restoration (1017 W 102nd: 1102 Bingham: 1401 W 109th; 1414 E 62nd; 1422 E 68th; 1516 E 85th; 11117 Longwood; 1700 Juneway; 2129 W 71st; 2909 E 78th; 2136 W 83rd; 3030 E 79th; 310 E 50th; 3213 Throop; 3723 W 68th; 406 E 87th; 417 Oglesby; 4520 Drexel; 4611 Drexel; 5001 Drexel; 5437 Laflin; 5450 Indiana; 5955 Sacramento; 6001 Sacramento; 61 E 92nd; 6160 MLK; 6217 Dorchester; 638 Avers; 6437 Kenwood; 6554 Rhodes; 6749 Merrill; 6759 Indiana; 6807 Indiana; 6825 Indiana; 6949 Merrill; 701 S 5th; 7026 Cornell; 7109 Calumet; 7110 Cornell; 7210 Vernon; 7237 Bennett; 7300 St. Lawrence; 7301 Stewart; 7420 Colfax; 7450 Luella; 7500 Eggleston; 7546 Saginaw; 7547 Essex; 7600 Kingston; 7625 East End; 7635 East End; 7656 Kingston; 7712 Euclid; 7748 Essex; 7749 Yates; 7750 Muskegon; 7760 Coles; 7834 Ellis; 7922 Luella; 7925 Kingston; 7927 Essex; 7933 Kingston; 7953 Woodlawn; 8000 Justine; 8030 Marquette; 8047 Manistee; 8100 Essex; 8104 Kingston; 8107 Kingston; 8201 Kingston; 8209 Ellis; 8214 Ingleside; 8326 Ellis; 8334 Ellis; 8342 Ellis; 8346 Constance; 8352 Ellis; 8403 Aberdeen; 8405 Marquette; 8432 Essex; 8517 Vernon; 8529 Rhodes; 8800 Ada; 9212 Parnell; 9610 Woodlawn; 10012 LaSalle; 11318 Church).

**Business Operations** 

3/28/2022 JR

1.70 Extensive review of monthly property reports for all of 2021 (all) (1.3); exchange communication with accounting associate requesting missing property reports (all) (.4).

**Business Operations** 

JRW 0.20 Exchange correspondence with vendor regarding outstanding invoices (defer).

3/28/2022 KMP

0.80 Continue work on spreadsheets relating to receipts and expenses for motion for expense restoration (1017 W 102nd; 1102 Bingham; 1401 W 109th; 1414 E 62nd; 1422 E 68th; 1516 E 85th; 11117 Longwood; 1700 Juneway; 2129 W 71st; 2909 E 78th; 2136 W 83rd; 3030 E 79th; 310 E 50th; 3213 Throop; 3723 W 68th; 406 E 87th; 417 Oglesby; 4520 Drexel; 4611 Drexel; 5001 Drexel; 5437 Laflin; 5450 Indiana; 5955 Sacramento; 6001 Sacramento; 61 E 92nd; 6160 MLK; 6217 Dorchester; 638 Avers; 6437 Kenwood: 6554 Rhodes: 6749 Merrill: 6759 Indiana: 6807 Indiana: 6825 Indiana; 6949 Merrill; 701 S 5th; 7026 Cornell; 7109 Calumet; 7110 Cornell; 7210 Vernon; 7237 Bennett; 7300 St. Lawrence; 7301 Stewart; 7420 Colfax; 7450 Luella; 7500 Eggleston; 7546 Saginaw; 7547 Essex; 7600 Kingston; 7625 East End; 7635 East End; 7656 Kingston; 7712 Euclid; 7748 Essex; 7749 Yates; 7750 Muskegon; 7760 Coles; 7834 Ellis; 7922 Luella; 7925 Kingston; 7927 Essex; 7933 Kingston; 7953 Woodlawn; 8000 Justine; 8030 Marguette; 8047 Manistee; 8100 Essex; 8104 Kingston: 8107 Kingston: 8201 Kingston: 8209 Ellis: 8214 Ingleside: 8326 Ellis: 8334 Ellis: 8342 Ellis: 8346 Constance: 8352 Ellis: 8403 Aberdeen: 8405 Marguette; 8432 Essex; 8517 Vernon; 8529 Rhodes; 8800 Ada; 9212 Parnell; 9610 Woodlawn; 10012 LaSalle; 11318 Church).

**Business Operations** 

3/31/2022 MR

0.10 Attention to e-mail from counsel on new complaint and waiver of service (defer).

**Business Operations** 

SUBTOTAL: [38.00 7422.00]

	<u>Date</u>	Indiv	<u>Hours</u>	Description		
Case Ad	Case Administration					
	3/3/2022	AW	0.90	Call with K. Duff regarding update to receivership web page (.2); call with IT consultant regarding update to website (.1); create link containing pleadings for upload to web page and follow up email regarding supplement to IT consultant (.6).		
				Case Administration		
	3/8/2022	AW	0.40	Review motions to approve process and motion to approve sale and related email exchanges with M. Rachlis.		
				Case Administration		
		JR	0.10	Communication with K. Duff regarding preparation for trial related to a complaint filed against EB related to tenant matter.		
				Case Administration		
	3/9/2022	AW	0.30	Work with IT consultant on update to webpage (.2); communicate with J. Wine regarding voluminous filings upload (.1).		
				Case Administration		
		JRW	0.10	Confer with K. Duff regarding vendor invoice.		
				Case Administration		
		KMP	0.10	Communications with K. Duff and J. Wine regarding vendor invoice for maintenance of claims database and status of issues relating to claims documentation.		
				Case Administration		
	3/15/2022	JRW	0.20	Confer with A. Watychowicz regarding file management for claims process materials.		
				Case Administration		
	3/17/2022	AW	0.20	Review updates to Receivership web page and communicate with IT vendor regarding further revisions.		
				Case Administration		
	3/21/2022	AW	0.70	Prepare update to receivership web page and related email to IT vendor.		
				Case Administration		
	3/24/2022	AW	0.10	Attention to motion for extension and entered orders and related communication with counsel (Group 1).		
				Case Administration		

Da	ate	Indiv	<u>Hours</u>	Description	_
3/	24/2022	JRW	0.10	Exchange correspondence with K. Duff regarding vendor invoice.	
				Case Administration	
3/	25/2022	AW	0.10	Attention to entered order regarding extension on status report, related email to counsel, and docket update (Group 1).	
				Case Administration	
3/	31/2022	JRW	0.20	Exchange correspondence with K. Duff, M. Rachlis and A. Porter regarding state court foreclosure proceeding.	
				Case Administration	
SUBTOTAL	_:			[ 3.50 562.00	_ 0]

# Claims Administration & Objections

3/1/2022 AW

1.40 Attention to claimant's email regarding Receiver's recommendations, work with K. Duff and J. Wine on standard response, and reply to claimant (Group 1) (.3); communicate with J. Wine and K. Pritchard regarding productions served on counsel (sole lien) (.3); call with K. Pritchard regarding document productions (sole lien) (.3); locate produced files and share with counsel (6749 Merrill; 7110 Cornell) (.2); email exchange with J. Wine regarding service list to update counsel on status of productions (sole lien) (.3).

Claims Administration & Objections

**JRW** 0.80 Attention to claimant inquiry (all) (.2); draft communication to Group 1 claimants regarding responsive statements and related correspondence with K. Duff and A. Watychowicz (Group 1) (.3); correspondence to database vendor regarding claimants' requests for exports (all) (.2); confer with A. Watychowicz and K. Pritchard regarding service of document productions (sole lien) (.1).

Claims Administration & Objections

**KMP** 0.60 Work with A. Watychowicz regarding compilation and service of produced documents, prepare chart tracking receipt and service of produced documents, and related communications with J. Wine (sole lien).

Claims Administration & Objections

0.30 Attention to claimant communications regarding submissions and related follow up (Group 1).

Claims Administration & Objections

3/3/2022 AW

MR

0.80 Draft response email to claimant, email exchange with K. Duff regarding same and related email to claimant (all) (.2); follow up with claimant's counsel regarding entered order for extension to respond to Receiver's recommendation (Group 1) (.1); attention to entered order regarding extension to respond to Receiver's recommendation, communication regarding draft email, and related email to claimants (Group 1) (.3);

Date	Indiv	Hours	Description
			email documents produced pursuant to subpoenas to counsel and confirm with J. Wine current service list (sole lien) (.2).
			Claims Administration & Objections
3/3/2022	JRW	1.80	Correspondence to third-party regarding status of production in response to subpoena (1017 W 102nd; 10012 LaSalle; 11318 Church; 1516 E 85th; 2129 W 71st; 2136 W 83rd; 3213 Throop; 406 E 87th; 417 Oglesby; 6554 Rhodes; 6759 Indiana; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7922 Luella; 7925 Kingston; 8030 Marquette; 8104 Kingston; 8107 Kingston; 8346 Constance; 8403 Aberdeen; 8432 Essex; 8517 Vernon; 8529 Rhodes; 9212 Parnell; 9610 Woodlawn) (.1); multiple telephone conferences with claimants' counsel regarding database export (all) (.6); study claimant submission, conduct additional database searches, and related correspondence regarding late filing of additional claim (all) (.8); review EquityBuild records regarding buyout histories for claims analysis (all) (.3).
			Claims Administration & Objections
	KMP	0.20	Update chart relating to service of document productions on lenders' counsel (sole lien).
			Claims Administration & Objections
	MR	0.50	Review claims and follow up related to Group 1 (7625 East End).
			Claims Administration & Objections
3/4/2022	JRW	0.30	Confer with J. Rak and A. Watychowicz regarding records supporting position statement (Group 1) (.2); email and telephone conference with claimants' counsel and M. Rachlis regarding extension of deadline to file responsive position statement (Group 1) (.1).
			Claims Administration & Objections
	MR	0.10	Attention to emails, conferences and motion regarding extension of deadline to file position statement (Group 1).
			Claims Administration & Objections
3/7/2022	AW	0.90	Communicate with J. Wine regarding update on claims email to claimants (all) (.2); email claimant regarding update on claims process (all) (.1); prepare file for transfer and email claimants requested claims files (4533 Calumet; 8100 Essex; 6217 Dorchester; 6355 Talman) (.4); work on email to claimants regarding extension of time to file responsive statement and related email to claimants (Group 1) (.2).
			Claims Administration & Objections
	JRW	1.80	Confer with K. Duff and A. Watychowicz regarding correspondence to Group 1 claimants regarding responsive position statements (Group 1) (.2); correspondence to court's clerk regarding outstanding motion for extension (Group 1) (.1); exchange correspondence with database vendor regarding processed data volume (all) (.1); confer with K. Duff and M. Rachlis

Date	Indiv	<u>Hours</u>	Description
			regarding status update (sole lien) (.1); attention to claimant inquiry and related conference regarding distributions to retirement accounts (all) (.3); review documents from third party subpoena (6749 Merrill; 7110 Cornell) (1.0).
			Claims Administration & Objections
3/7/2022	MR	0.10	Attention to status and related communications with J. Wine (sole lien).
			Claims Administration & Objections
3/8/2022	AW	0.40	Attention to email regarding claims, review claim and supporting documents, work with claimant and counsel on resolution, and related emails to claimant (6250 Mozart; 6356 California).
			Claims Administration & Objections
3/9/2022	AW	0.60	Continued work on claim issue, contact vendor regarding submissions, email exchanges with K. Duff and J. Wine, and related instructions to claimant (6250 Mozart; 6356 California).
			Claims Administration & Objections
	JRW	0.30	Confer with A. Watychowicz regarding claimant inquiry and late submission of claims (all) (.1); exchange correspondence with database vendor regarding records (all) (.2).
			Claims Administration & Objections
3/10/2022	AW	0.30	Attention to proof of claim form and supporting documents, record claim, and related email to counsel and claimant (6250 Mozart; 6356 California).
			Claims Administration & Objections
	JRW	1.20	Confer with A. Watychowicz regarding download of EB records (all) (.3); confer with database vendor regarding database volume (all) (.2); conference call with database vendor and claimants counsel regarding database export options (all) (.6); attention to claimant inquiry (all) (.1).
			Claims Administration & Objections
3/11/2022	JRW	0.50	Exchange correspondence with A. Porter regarding analysis of releases (all) (.1); telephone conference with claimants' counsel regarding EB documents (all) (.1); confer with K. Duff and M. Rachlis regarding EB records database and claimants' request for records (all) (.3).
			Claims Administration & Objections
	MR	0.30	Conference with K. Duff and J. Wine regarding EB records database and claimants' request for database records (all).
			Claims Administration & Objections

<u>Date</u>	Indiv	Hours	Description
3/14/2022	AW	1.40	Review, legal and record cite check of insert on sole lien process, and related email to M. Rachlis (sole lien) (1.1); attention to responsive statement and related email to counsel (Group 1) (.2); correspondence with claimant regarding access to claims files (all) (.1).
			Claims Administration & Objections
	JRW	0.50	Review claimants' responsive position statements (Group 1).
			Claims Administration & Objections
	MR	0.70	Attention to claims submissions and related follow up (Group 1).
			Claims Administration & Objections
3/15/2022	AW	1.40	Research for claim analysis and related emails to M. Rachlis and J. Wine (Group 1).
			Claims Administration & Objections
	JRW	2.80	Study claimant's responsive statement (Group 1) (1.1); confer with M. Rachlis regarding transfers of claimant's loan proceeds and related research and analysis regarding bank activity (Group 1) (1.7).
			Claims Administration & Objections
	MR	5.00	Further review of submission by claimant (Group 1) (1.3); follow up with J. Wine regarding issues for response (Group 1) (1.7); research on issues raised in position statement (Group 1) (2.0).
			Claims Administration & Objections
3/16/2022	JRW	0.50	Continue studying claimant's responsive position statement on fraudulent conveyance issue (Group 1).
			Claims Administration & Objections
	MR	3.50	Additional work and research on avoidance issues to prepare reply brief (Group 1).
			Claims Administration & Objections
3/17/2022	AW	0.40	Review claims and related detailed email and further communications with J. Rak (Group 1).
			Claims Administration & Objections
	JR	0.70	Review email from M. Rachlis, further communication with A. Porter regarding purchase of property or properties in 2017 by EquityBuild and the use of institutional lender funds, conduct analysis and provide M. Rachlis with the requested property information (Group 1).
			Claims Administration & Objections

<u>Date</u>	Indiv	Hours	Description
3/17/2022	MD	2.00	Firstly an available during (Charles 1)
3/11/2022	IVIK	2.00	Further work on draft reply brief (Group 1).
			Claims Administration & Objections
3/18/2022	MR	3.00	Further work and draft reply brief on avoidance issues (Group 1).
			Claims Administration & Objections
3/20/2022	MR	2.70	Additional work on reply brief relating to avoidance claims (Group 1).
			Claims Administration & Objections
3/21/2022	AW	3.60	Review draft reply brief on avoidance issues and correspond with M. Rachlis regarding proposed revisions (Group 1) (2.4); update claimants' information sheet with latest appearances, withdrawal, and requests for change of address and related email to J. Wine (all) (.9); research and email exchanges with J. Wine regarding claimants' service list (all) (.3).
			Claims Administration & Objections
	JRW	0.40	Confer with A. Watychowicz and K. Duff and related correspondence to counsel for claimants regarding settlement status and claimant contact information (defer).
			Claims Administration & Objections
	MR	1.00	Further review and work on draft reply regarding avoidance issues and related follow up (Group 1).
			Claims Administration & Objections
3/22/2022	AW	0.40	Review motion for extension, communicate with M. Rachlis regarding revisions, finalize and file with court (Group 1).
			Claims Administration & Objections
	JRW	3.90	Review and revise draft reply in support of avoidance claim and related factual research (Group 1) (2.2); review alternate spreadsheets containing claimant information and confer with A. Watychowicz regarding format (all) (.1); confer with A. Watychowicz regarding docket, prepare draft of joint status report and related correspondence and conference with claimants' counsel regarding extension (Group 1) (1.3); separate conferences with claimants' counsel regarding EquityBuild document export and related correspondence (all) (.3).
			Claims Administration & Objections
	MR	0.60	Attention to extension issues and further attention to brief (Group 1) (.3); attention to claims status report (Group 1) (.3).
			Claims Administration & Objections

Date	Indiv	Hours	Description
3/23/2022	AW	0.40	Attention to voice message from claimant, research claim and information regarding counsel, and related email to K. Duff (6437 Kenwood; 7026 Cornell; 1131 E 79th; 6217 Dorchester; 7546 Saginaw).
			Claims Administration & Objections
	JRW	0.40	Exchange various correspondence and drafts with K. Duff, M. Rachlis, SEC, and claimants' counsel regarding joint status report (Group 1).
			Claims Administration & Objections
	MR	0.70	Attention to various issues regarding claims status report (Group 1) (.5); conferences with claimant's counsel and K. Duff on extension (Group 1) (.2).
			Claims Administration & Objections
3/24/2022	AW	0.30	Communicate with J. Wine regarding custodian issues (all) (.1); communicate with J. Wine regarding motion for extension and follow up with the court (Group 1) (.1); respond to claimant's voice message by email (all) (.1).
			Claims Administration & Objections
	JRW	0.30	Correspondence to court clerk regarding motion for extension of deadline to file reply to claimant's responsive statement (Group 1) (.1); review motion for extension of deadline to file status report (Group 1) (.1); correspondence regarding status report and parties' positions regarding evidentiary hearing (Group 1) (.1).
			Claims Administration & Objections
	MR	2.00	Additional review and edits on reply brief and related follow up, and attention to extension order (Group 1) (1.7); attention to claims status report issues (Group 1) (.2); attention to database issues (all) (.1).
			Claims Administration & Objections
3/25/2022	AW	0.60	Review claims and prior email communications and respond to claimants' emails regarding update on claims process (all).
			Claims Administration & Objections
	JRW	2.60	Additional correspondence regarding Group 1 proceedings and related conference with K. Duff and M. Rachlis (Group 1) (.4); review and revise draft reply to avoidance claim (Group 1) (2.1); correspondence with claimants' counsel regarding EB document export (all) (.1).
			Claims Administration & Objections

Date	Indiv	Hours	Description
3/25/2022	MR	2.20	Further work and attention to draft reply brief (Group 1) (1.0); conferences regarding issues on status report with K. Duff and J. Wine (Group 1) (.3); work on language for status report and review and revise various versions (Group 1) (.9).
			Claims Administration & Objections
3/26/2022	MR	1.50	Further review and edits to draft reply and related follow up (Group 1).
			Claims Administration & Objections
3/27/2022	MR	0.50	Attention to draft reply and related follow up with A. Watychowicz (Group 1).
			Claims Administration & Objections
3/28/2022	AW	4.20	Respond to claimant's email regarding claims process (all) (.1); review revised avoidance reply brief, communicate with counsel regarding requirements, prepare and modify exhibits to same (Group 1) (2.3); further review reply brief and email exchanges regarding proposed revisions (Group 1) (.8); review public records and related email to counsel (Group 1) (.4); finalize reply, file with court, and serve as per service list (Group 1) (.6).
			Claims Administration & Objections
	JRW	4.80	Additional revision, related correspondence, and finalization of Receiver's reply to claimant's submission on avoidance issues and exhibits thereto (Group 1) (4.7); review draft of joint status report (Group 1) (.1).
			Claims Administration & Objections
	MR	2.70	Work on completing avoidance reply and exhibits (Group 1) (2.2); various exchanges with K. Duff, J. Wine and A. Watychowicz regarding various issues regarding brief and filing (Group 1) (.5).
			Claims Administration & Objections
3/29/2022	JRW	0.50	Exchange correspondence with claimants' counsel regarding EB records database (all) (.1); exchange drafts and correspondence with M. Rachlis and claimants' counsel regarding joint status report (Group 1) (.4).
			Claims Administration & Objections
	KMP	1.90	Review and comment on draft joint status report and related communications with K. Duff, M. Rachlis, and J. Wine (Group 1) (.7); revise, finalize, and file joint status report (Group 1) (.4); revise, finalize, and file corrected joint status report and related communications with M. Rachlis (Group 1) (.8).
			Claims Administration & Objections
	MR	1.10	Attention to draft status report and related follow up (Group 1) (.5); various exchanges and follow up with K. Duff, J. Wine and other counsel (Group 1) (.4); file corrected version and follow up regarding same (Group 1) (.2).
			Claims Administration & Objections

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	<u>Date</u>	Indiv	Hours	Description	
	3/30/2022	AW	0.10	Communicate with J. Wine regarding claimants' custodian issue (all).  Claims Administration & Objections	
SUBTO	ΓAL:			[74.50 208	363.00]
Tax Issu	es		_		
	3/16/2022	KMP	0.20	Review agency notice relating to EB entity and forward to tax accountant freview.	or
				Tax Issues	
SUBTO	ΓAL:			[ 0.20	28.00]
				117.50 \$29,0	057.00

Other Charges			
	Description	_	
Asset Analysis & Recovery			
	Fee for document production in response to subpoena		50.00
	Photocopies for March 2022		13.30
SUBTOTAL:		[	63.30]
Business Operations			
	Software license fees for March 2022 (Summit Hosting, \$181.41; Google Suite, \$96)		277.41
SUBTOTAL:		[	277.41]
Claims Administration & Objections			
	Online research for March 2022		784.09
SUBTOTAL:		[	784.09]
Total Other Charges			\$1,124.80

Summary of Activity

Guilli	iary of Activity
	Hours Rate
Jodi Wine	31.10 260.00 \$8,086.00
Ania Watychowicz	21.80 140.00 \$3,052.00
Justyna Řak	15.00 140.00 \$2,100.00
Kathleen M. Pritchard	14.10 140.00 \$1,974.00
Ellen Duff	3.50 390.00 \$1,365.00
Michael Rachlis	32.00 390.00 \$12,480.00

### **SUMMARY**

TOTAL DUE	\$30,181.80
Other Charges	\$1,124.80
Legal Services	\$29,057.00

## Exhibit H



Remit to Address: KMA, S.C. 125 S Wacker Drive Ste 1000 Chicago, IL 60606 312-629-0900 www.cpakma.com

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice Number: CH600462
Date 1/31/2022
Date Due: Upon Receipt

Services rendered in January, 2022 as follows:

<u>Date</u>	<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/13/2022 Phone call w	B. Fish ith Giorgio and Ellen to discuss next steps in preparing monthly stateme		\$110.00 2021	\$55.00
01/13/2022 Phone call to	G. Castaldi o discuss next steps regarding property statements and information tran		\$110.00 set up.	\$165.00
01/14/2022 2021 Proper	G. Castaldi ty Statements review	2.00	\$110.00	\$220.00
01/14/2022 Monthly rep		5.00	\$68.00	\$340.00
01/17/2022 Entering mo	D. Arce nthly data for year 2021.	2.20	\$68.00	\$149.60
01/18/2022 Preparation	D. Arce of 2021 property statements.	7.50	\$68.00	\$510.00
01/19/2022 Preparation	D. Arce of 2021 property statements.	5.20	\$68.00	\$353.60
01/19/2022 preparing 20	G. Castaldi 121 property statements.	0.20	\$110.00	\$22.00
01/21/2022 Preparing 20	G. Castaldi 121 property statements	7.50	\$110.00	\$825.00
01/24/2022	D. Arce	7.80	\$68.00	\$530.40

Thank you for your prompt payment.

(Payments can be mailed or accepted online at: cpakma.com)
Echecks and Credit/Debit Cards Accepted: MasterCard, VISA, AMEX & Discover

Billings that are past due over sixty (60) days will receive a late fee of 1% per month, which will be applied to all balances sixty (60) days from the date of the original invoice.

#### Case: 1:18-cv-05587 Document #: 1251 Filed: 05/16/22 Page 152 of 162 PageID #:65747

Client: **EQUITYBUILD INC** RECEIVERSHIP Invoice Number: CH600462 Page: 2 Preparation of 2021 property statements. 01/25/2022 D. Arce 7.80 \$68.00 \$530.40 Preparation of 2021 property statements. 01/25/2022 G. Castaldi 8.00 \$110.00 \$880.00 Preparation of 2021 property statements 01/26/2022 G. Castaldi 8.00 \$110.00 \$880.00 Preparation of 2021 Property statements. 01/27/2022 D. Arce \$68.00 1.00 \$68.00 Preparation of 2021 property statements. 01/27/2022 G. Castaldi 8.00 \$110.00 \$880.00 Preparation of 2021 Property statements 01/28/2022 D. Arce 0.80 \$68.00 \$54.40 Preparation of 2021 property statements. 01/31/2022 D. Arce 0.80 \$68.00 \$54.40

Entering monthly info for year 2021.

Preparation of 2021 property statements.

01/31/2022 G. Castaldi

Invoice Total: \$6,792.80

\$275.00

2.50 \$110.00

Thank you for your prompt payment.



Remit to Address: KMA, S.C. 125 S Wacker Drive Ste 1000 Chicago, IL 60606 312-629-0900 www.cpakma.com

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice Number: CH600463
Date 2/28/2022
Date Due: Upon Receipt

Services rendered in February, 2022 as follows:

<u>Date</u>	<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/01/2022 Preparation	G. Castaldi of 2021 property statements	1.30	\$110.00	\$143.00
02/04/2022 Preparing 20	G. Castaldi 21 property statements.	2.00	\$110.00	\$220.00
02/07/2022 preparation	G. Castaldi of 2021 property statements.	1.00	\$110.00	\$110.00
02/08/2022 Preparation	G. Castaldi of 2021 property statements.	1.00	\$110.00	\$110.00
02/09/2022 Updating pro	D. Arce operty numbers.	0.20	\$68.00	\$13.60
02/21/2022 IRS notice re	G. Castaldi sponse letter	0.10	\$110.00	\$11.00
	D. Weinberg IRS re: 2017 penalties	0.50	\$275.00	\$137.50
02/23/2022 preparation	G. Castaldi of response notices for various entities.	1.00	\$110.00	\$110.00
	D. Weinberg nership penalty abatement letters to IRS	0.60	\$275.00	\$165.00

Thank you for your prompt payment.

(Payments can be mailed or accepted online at: cpakma.com)
Echecks and Credit/Debit Cards Accepted: MasterCard, VISA, AMEX & Discover

Billings that are past due over sixty (60) days will receive a late fee of 1% per month, which will be applied to all balances sixty (60) days from the date of the original invoice.

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Client: **EQUITYBUILD INC** 

RECEIVERSHIP

Invoice Number: CH600463

Page: 2

Invoice Total: \$1,020.10

Thank you for your prompt payment.



Remit to Address: KMA, S.C. 125 S Wacker Drive Ste 1000 Chicago, IL 60606 312-629-0900 www.cpakma.com

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice Number: CH600461
Date 3/31/2022
Date Due: Upon Receipt

Services rendered in the month of March, 2022 as follows:

<u>Date</u>	<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	G. Castaldi of December 2021 Property Statements.	2.00	\$110.00	\$220.00
	G. Castaldi of December 2021 property statements.	0.50	\$110.00	\$55.00
03/24/2022 Working on	D. Arce property reports.	0.40	\$68.00	\$27.20
03/25/2022 Updating pr	D. Arce roperty spreadsheets.	1.00	\$68.00	\$68.00
03/28/2022 Phone call re	D. Arce egarding property statements.	0.20	\$68.00	\$13.60
03/29/2022 Updating pr	D. Arce roperty statements.	3.70	\$68.00	\$251.60
03/30/2022 Updating pr	D. Arce roperty statements	0.50	\$68.00	\$34.00
03/30/2022 Phone call a	D. Arce nd emails with Justyna regarding property statements.	0.50	\$68.00	\$34.00
03/31/2022 Updating pr	D. Arce roperty statements.	5.20	\$68.00	\$353.60

Thank you for your prompt payment.

(Payments can be mailed or accepted online at: cpakma.com)
Echecks and Credit/Debit Cards Accepted: MasterCard, VISA, AMEX & Discover

Billings that are past due over sixty (60) days will receive a late fee of 1% per month, which will be applied to all balances sixty (60) days from the date of the original invoice.

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Client: EQUITYBUILD INC

RECEIVERSHIP

Invoice Number: CH600461

Page: 2

Invoice Total: \$1,057.00

Thank you for your prompt payment.

## Exhibit I



4123 Lankershim Boulevard North Hollywood, CA 91602

Kevin B. Duff Receiver for EquityBuild Inc Rachlis Duff Adler Peel & Kaplan LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Invoice: 552868 SEC E.A. reference:

ID: SEC/DC Case Number: 1:18-cv-05587 3077400 Date:

04/21/2022 Responsible Party for Payment:

Due Date: 04/21/2022 Tax Administrator Appointment Date:

For professional services rendered as follows:			SEC		
<u>DATE</u>	<u>SERVICE</u>	STAFF	DISCOUNT RATE	<u>HOURS</u>	<u>AMOUNT</u>
General Consulting S	ervices - General Consulting				
10/28/2021	Prepare/Draft/Edit/Finalize	JMD	440.000	4.20	1,848.00
	Telephone calls with Receiver relating to Tax Priority Claims.				
10/28/2021	Review	JMD	440.000	0.70	308.00
	Review email from Receiver relating to Tax Priority Claims.				
Information Return Re	eporting Services - Information Return Reporting	3			
01/27/2022	Forms Review	MRR	176.000	0.50	88.00
	reviewed Form 1099				
01/28/2022	Forms Review	MRR	176.000	0.40	70.40
	reviewed additional 1099s				
01/28/2022	Release for Printing	ER	160.000	0.10	16.00
	Forms 1099-MISC and 1099-NEC.				
	Fund Services - Form 8842				
04/07/2021	Preparation	JAC	180.000	0.50	90.00
	Preparation of 2021 Form 8842.				
Qualified Settlement I	Fund Services - Estimated Taxes				
09/08/2021	Preparation	JGM	216.000	0.30	64.80
	Quarterly estimated tax payments 2021 Q3.				
09/10/2021	Preparation	JGM	216.000	0.40	86.40
	Quarterly estimated tax payments 2021 Q3.				
	Fund Services - Tax Return				
04/06/2021	Preparation	JAC	180.000	0.20	36.00
	Preparation of 2020 tax returns.				
09/20/2021	Preparation	JAC	180.000	0.20	36.00
	Preparation of 2020 tax returns.				
10/08/2021	Preparation	JAC	180.000	0.40	72.00

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					Page 2 of 3
	Preparation of 2020 tax returns.				
10/11/2021	Preparation	JAC	180.000	1.00	180.00
	Preparation of 2020 tax returns.				
10/11/2021	Preparation	CV	96.000	4.50	432.00
	Tax Return Prep				
10/13/2021	Preparation	MRC	140.000	1.00	140.00
	Updated data for 2020 tax return filing.				
10/13/2021	Final Review	JD	440.000	1.00	440.00
<b>Qualified Settlement</b>	Fund Services - Tax Return				
04/07/2021	Preparation	JAC	180.000	0.25	45.00
	Preparation of the 2020 Qualified Settlement Fund Income Tax Return.				
10/08/2021	Preparation	MRC	140.000	2.00	280.00
	Updated accounting for 2020 tax return.				
10/09/2021	Preparation	MRC	140.000	5.50	770.00
	Updated data for 2020 tax filing.				
10/10/2021	Preparation	JAC	180.000	0.25	45.00
	Preparation of 2020 tax returns.				
10/10/2021	Preparation	MRC	140.000	2.00	280.00
	Updated data for 2020 tax return preparation.  Matched 1099 to listed accounts. Added accounts on 1099 not provided in summary.				
10/11/2021	Preparation	MRC	140.000	4.50	630.00
	Updated data for 2020 tax return preparation.				
10/12/2021	Preparation	MRC	140.000	5.00	700.00
	Updated data and reconciled information to various workbooks provided by client. Reviewed items noted as distributions. Reviewed settlement documents.				
10/13/2021	Delivery	NAN	68.000	0.25	17.00
	Proof and dispatching 2020 1120SF				
01/24/2022	Preparation	MRC	144.000	8.00	1,152.00
	Updated accounting for 2021 tax return.				,
01/25/2022	Preparation	MRC	144.000	5.00	720.00
	Updated data for 2021 tax return preparation.				
01/26/2022	Preparation	MRC	144.000	2.00	288.00
	Updated data for 2021 tax return preparation.				
01/27/2022	Preparation	MRC	144.000	0.50	72.00
	Updated data for 2021 tax return preparation. Requested missing data.				
01/28/2022	Preparation	MRC	144.000	1.00	144.00
	Updated data for 2021 tax return.				
02/03/2022	Preparation	MRC	144.000	2.00	288.00
	Updated data for tax preparation. Prepared 2021 Federal and IL tax returns.				
02/15/2022	Preparation	MRC	144.000	1.00	144.00
	Updated data for 2021 tax return. Requested missing data.				
02/21/2022	Preparation	MRC	144.000	0.50	72.00
	Prepared 2021 Federal and IL tax returns.			_	
		Total for	or Services		9,554.60

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Information Return Reporting Services - Information Return Reporting

01/28/2022 Information Reporting

0.000

50.00

4 Form NEC and 1 MISC

**Total for Charges** 

50.00

Invoice Total

\$9,604.60

PLEASE REMIT PAYMENT VIA WIRE TRANSFER OR CHECK ACCORDING TO THE INSTRUCTIONS BELOW:
WIRE FUNDS TO:

CITY NATIONAL BANK
400 N. ROXBURY DRIVE, 5TH FLOOR
BEVERLY HILLS, CA 90210
ABA NUMBER 122016066 SWIFT CODE CINAUS6L
BENEFICIARY ACCOUNT NUMBER 113-238313
BENEFICIARY ACCOUNT NAME: MILLER KAPLAN ARASE LLP

MAKE CHECK PAYABLE TO:

MILLER KAPLAN ARASE LLP 4123 LANKERSHIM BLVD, NORTH HOLLYWOOD, CA 91602-2828

9,604.60

03/31/2022

0.00

02/28/2022

0.00

01/31/2022

0.00

12/31/2021+

5,988.00

<u>Total</u> \$15,592.60

# Exhibit J



### **Invoice**

EquityBuild Kevin Duff	BILL TO			
	EquityBuild Kevin Duff			

DATE	INVOICE#	
4/14/2022	14604	

TERMS	PROJECT

QUANTITY	SERVICED	DESCRIPTION	RATE	AMOUNT
I	1/10/2022	Updated website with entries	110.00	110.00
I	1/13/2022	Sent Ania screenshot of where Shaun Cohens emails are.	110.00	27.50
I	1/27/2022	Updated website for an emergency for Ania.	110.00	55.00
	2/7/2022	Updated website with lots of entries.	110.00	220.00
	3/4/2022	Added multiple uploads to website for Ania.	110.00	165.00
	3/9/2022	Updated website with lots of entries for Ania.	110.00	165.00
0.5	3/10/2022	Fixed entry on website. I had to upload the file differently due to the restrictions on uploading through website.	110.00	55.00
0.25	3/17/2022	Made some changes on website for Ania.	110.00	27.50
		Illinois Sales Tax	10.25%	0.00

**Total** \$825.00